

EXHIBIT A

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MICHAEL FANNON, RICHARD FARLEY,)
 JEFFERY FARRIS, DONALD FEATHERS,)
 RICHARD FIKE, MIKE FINDLAY,)
 DEXTER FLORENCE, ALFONSO FLORES JR.,)
 DOUGLAS FOGG, WILLIAM FOLEY,)
 JEFFREY FORRESTER,)
 GREGORY FORTADO, LEANDRO FORTYZ,)
 MAURICE FOWLER, GARY FOX,)
 ALBERT FRITTS, DANIEL GAMBLER,)
 PERFECTO GARCIA, STEVEN GATHMAN,)
 WILLIAM GAUDES, GEOFFREY GHIANDONI,)
 MICHAEL GIRARD, RUSSELL GLIDEWELL,)
 BRENT GLOVER, JAMES GOEHRING,)
 KELLY GOEHRING, RUDY GONZALES,)
 RICKY GOODRICH, ROBERT GORGACZ,)
 ROBERT GOULD, RODNEY GRADY,)
 CHRISTOPHER GRAHAM, DAMEN GRAHAM,)
 MICHAEL GRASSER, KEVIN GREEN,)
 KARLTON GREGSON, ALMA GUERRERO,)
 CHUCK GURWELL, BRITTANY HALEY,)
 JOHN HALEY, JASON HALL, LEE HALL,)
 MELANIE HANEY,)
 STEPHEN HANSON, WESLEY HARDESTY,)
 ROBERT HARDING,)
 THOMAS HARDY, RANDAL HASH,)
 FREDDIE HAWKINS, GREGORY HAYES,)
 JOHN HAYES, NORMAN HAYWARD,)
 PATRICK HAZELWOOD, WILLIAM HEALD,)
 RICHARD HEANING, JAMES HENRY,)
 GILBERT HERNANDEZ,)
 ROBERT HERNANDEZ, WILLIAM HERTZ,)
 WILLIAM HICKS, RICHARD HILLIS,)
 JORGE HIMAN, CYNTHIA HOCHHALTER,)
 GEORGE HOENING, KEITH HOLDING,)
 ANTHONY HOLLIDAY,)
 THOMAS HOLMQUIST SR., TERRY HOOD,)
 SALINA HOOVER, GEOFFREY HOWE,)
 RUSSELL HOWES, ROBERT HOYVALD,)
 DONALD HUGHES,)
 PERRYWINN HUNT, CHARLES K JACKSON,)
 GEORGE JACKSON, JAMES JEZAK,)
 ERRAN JOHNSON, GARY JOHNSON,)
 JOE JOHNSON JR., KENNETH JOHNSON,)
 RICHARD JOHNSON, TRAVIS JOHNSON,)
 WENDELL JOHNSON, JESSE JONES JR.,)
 MICHAEL JONES, SIDNEY JONES,)
 EZEQUIEL JURADO,)

MARTIN KAPP, RHONDA KASTNER,)
 AMIR KAZEMI, MICHAEL KEITH,)
 JEFFREY KELLEY, JOSEPH KETCHUM,)
 RONALD KILLEN, CHRISTOPHER KINCH,)
 JOSEPH KING, ALAN KIRKLAND,)
 JOSEPH KLAPPERICH, JOHN KLINGINSMITH,)
 JOHN KNIGHT, WENDY KOENIG,)
 GREGORY KOHLER, JOSEPH KREWKO,)
 LEONARD KRUPSKI, LOUIS LABELLA,)
 THOMAS LAMB, PAUL LAMPASSO,)
 KENNETH LANGLEY, JENNIFER LAPARR,)
 LALEA LAZAR, MILDRED LEE,)
 JOSEPH LEMANEK,)
 JOHN LEMMON, JESSE LEON,)
 GILBERT LEVECK, ARTURO LOPEZ,)
 LARRY LOPEZ, MIGUEL LOPEZ,)
 JASON LOYD, PAUL LUCERO,)
 AMY LUNGER, ANDREW LUNSFORD,)
 GERALD LUPINOS, WENDELL LYNCH,)
 DANIELLE LYNN, MICHAEL LYON,)
 THOMAS MACFARLAN, ALAN MACHIELA,)
 MICHAEL MACKENZIE,)
 CHARLES MADDOX III, FRANK MAJORS,)
 CHRIS MALLABURN,)
 VINCENT MARINACCIO, HARRY MARTIN III,)
 ROBERT MARTIN, GERARDO MARTINEZ,)
 JOSEPH MARTINEZ, DAVID MAUSLING,)
 DONALD MCCANN, DALE MCCLURE,)
 LOGAN MCCUNE, HAROLD MCKEEHAN,)
 BRENDAN MCMAHON,)
 KEVIN MCNEMAR, FELIPE MENDOZA,)
 MARIELENA MENDOZA, REID METCALF,)
 RAY MILEY, JENNIFER MILLER,)
 ROGER MILLER, TRACY MILLER,)
 MELISSA MILLWOOD, MICHAEL MILROY,)
 GENE MILTNER, JAMES MOMAN,)
 JOSEPH MOORE, ROBERT MOORE,)
 SAMUEL MORIN, GARY MORING,)
 PETE MORRISON, MARY MORROW,)
 DUSTIN MURRAY,)
 MARK NAPOLES, TIMMIE NASSIF,)
 THOMAS NELSON, ALVIN NEUMANN,)
 DANIEL NICHOLS,)
 RICHARD NIELSEN, ROD NIJIM,)
 RONALD NORMAN, CURTIS NUCKLES,)
 TERRY NYLUND,)
 MARTIN OAKLEY, JOHN OLDFATHER,)

WALTER OLDHAM, JAMES LELLEN OODY,)
WALTER OSTERBERG JR., MITCHELL OTT,)
JAMES OVERTURF, CHARLES OWEN,)
ERIC PACHECO,)
CLIFTON PAPPION JR., DAVID PARK,)
JASON PATRYLO, STEVE PATTERSON,)
JAMES PAULETTE, DONALD PAYNE,)
RANDY PAYNE, TEMPER PAYNE,)
PATRICK PEARCE, ERIC PETTY,)
JUSTIN PICKLER,)
JEFFREY PLUFF, ROBERT POLACEK,)
FRANCIS POLING, JR.,)
KEITH POND, ANETTE POPLARCHICK,)
HECTOR POVENTUD, NEAL POWELL,)
GREGORY PRANGE, KEVIN PROKOP,)
JOSEPH PRUITT, RAYMOND PULLEN JR.,)
RONALD PUMPHREY, VINCENT QUINTANA,)
THOMAS RAINEY, DAVID RAMOS,)
MARSHALL RAMSEY, FRANK RANDALL,)
JOSEPH REYES, MICHAEL RICCIARDI,)
STEVEN RICH, TOMMY RICHARDS,)
LINDA RICHARDSON, KENNETH RICHEY,)
ALLEN RICHTER, RICHARD RIEL,)
MICHAEL RIENZO, BILL RILEY,)
ERVIN ROBERSON, STEPHEN ROBERTS,)
STEPHEN ROSENTHAL, EDWARD ROTH SR.,)
RONALD ROUSE, SYLVESTER RUSH,)
LAWRENCE RUSSELL, NATHAN RUSSELL,)
CRISTIAN SANCHEZ, JOHN SANTISTEVAN,)
HENRY SANTO, JOSE SANTOS,)
WILLIAM SAVAGE JR., JOSEPH SCHIAVONE,)
DANIEL SCHIMMEL, FRANK SCHNEIDER,)
DANIEL SCOTT, STEVEN SEAMONS,)
CARSON SHAFFER, JASON SHEAD,)
WILLIAM SHEARER, WILLIAM SHELTON,)
CHARLES SIMMONS, ANTHONY SIMON,)
DORIS SIMONS, DAVID SIZEMORE,)
BENJAMIN SMITH,)
DANNY SMITH, JACOB SMITH,)
LAWRENCE SMITH, MICHAEL A. SMITH,)
DAVID SNOOK, JOSEPH SPARROW IV,)
JOHN SPRAGGINS, RUSSELL SPRUILL,)
PIERRE ST. GERMAIN, DAVID STETSON,)
TERRI STEPHENS,)
JIMMY STEWART, JOHN STEWART,)
LARRY STEWART, THOMAS STOCKDALE,)
SANDRA STODDARD, DAVID SULLIVAN,)

JACK SULLIVAN,)
MELISSA SURKAMER, GARY SWAIN,)
JESE SWEENEY, JERRY SWITZER,)
MICHAEL TALIK, ELIJAH TAYLOR,)
JOHN TAYLOR, JESSICA THOMAS,)
ROBERT THOMAS,)
CHRISTOPHER TOWNSEND,)
WALTER TRAUGH, JOSHUA TRUESDELL,)
SCOT TUCKER, RICH TURNER,)
TIM VAN ENGELLENHOVEN, WILSON VELEZ,)
ROBERT VENESKY, TRIAN VIAN,)
CASEY VICKERS, RUBEN VILLANUEVA JR.,)
SHANNON WAGNER, BRIAN WALKER,)
CHRISTOPHER WALKER,)
DONALD WALLACE, ROBERT WALLETT,)
WILLIAM WARD, LARRY WASHINGTON,)
LATRISTA WEATHERSPOON,)
TODD WHITCOMB, WALKER WHITE,)
LEWIS WILCHER, WILLIAM WILDMAN,)
TYLER WILKINSON, BENJAMIN WILLIAMS,)
JOHN WILLIAMS, JAMES WILLIAMS JR.,)
MICHAEL WILLIAMS, WILLIAM WILSON JR.,)
BERND WINDERLICH,)
TINISHA WITT, GREGORY ZANETELL,)
VERNON ZIMMERMAN, ROBERT ZOUSE,)
Plaintiffs,)
v.)
THE 3M COMPANY (f/k/a Minnesota Mining)
and Manufacturing Company);)
AGC CHEMICALS AMERICAS INC.;)
AMEREX CORP; ARCHROMA U.S.)
INC.; ARKEMA, INC.; BASF CORP.;)
BUCKEYE FIRE EQUIPMENT CO.;)
CARRIER GLOBAL CORP.; CHEMDESIGN)
PRODUCTS, INC.; CHEMGUARD, INC.;)
CHEMICALS, INC.; THE CHEMOURS CO.;)
CHEMOURS COMPANY FC, LLC;)
CHUBB FIRE, LTD.; CLARIANT CORP.;)
CORTEVA, INC.; DEEPWATER)
CHEMICALS, INC., DU PONT DE)
NEMOURS, INC.; DYNAX CORP.,)
E.I. DU PONT DE NEMOURS AND)

COME NOW, Plaintiffs, by and through undersigned counsel, and allege upon information and belief as follows:

1. Plaintiffs bring this action for damages for personal injury resulting from exposure to aqueous film-forming foams (“AFFF”) and firefighter turnout gear (“TOG”) containing the toxic chemicals collectively known as per and polyfluoroalkyl substances (“PFAS”). PFAS includes, but is not limited to, perfluorooctanoic acid (“PFOA”) and perfluorooctane sulfonic acid (“PFOS”) and related chemicals including those that degrade to PFOA and/or PFOS.
2. AFFF is a specialized substance designed to extinguish petroleum-based fires. It has been used for decades by military and civilian firefighters to extinguish fires in training and in response to Class B fires.

3. TOG is personal protective equipment designed for heat and moisture resistance in order to protect firefighters in hazardous situations. Most turnout gear is made up of a thermal liner, moisture barrier, and an outer layer. The inner layers contain PFAS, and the outer layer is often treated with additional PFAS.

4. Defendants collectively designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold, and/or otherwise released into the stream of commerce AFFF or TOG with knowledge that it contained highly toxic and bio persistent PFAS, which would expose persons who came into contact with the product either directly (use as intended) or indirectly (as an aftermath of use through air, soil, water) to the risks associated with PFAS. Further, defendants designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF or TOG which contained PFAS for use in firefighting.

5. PFAS binds to proteins in the blood of humans exposed to the material and remains and persists over long periods of time. Due to their unique chemical structure, PFAS accumulates in the blood and body of exposed individuals.

6. PFAS are highly toxic and carcinogenic chemicals. Defendants knew, or should have known, that PFAS remain in the human body while presenting significant health risks to humans.

7. Defendants' PFAS-containing AFFF or TOG products were used by Plaintiffs in their intended manner, without significant change in the products' condition. Plaintiffs were unaware of the dangerous properties of Defendants' AFFF or TOG products and relied on Defendants' instructions as to the proper handling of the products. Plaintiffs' consumption, inhalation and/or dermal absorption of PFAS from Defendant's AFFF or TOG products caused Plaintiffs to develop the serious medical conditions and complications alleged herein.

8. Through this action, Plaintiffs seek to recover compensatory and punitive damages arising out of the permanent and significant damages sustained as a direct result of exposure to Defendants' AFFF or TOG products or water contaminated with PFAS from Defendants' AFFF or TOG products at various locations during the course of Plaintiffs' training and firefighting activities. Plaintiffs further seek injunctive, equitable, and declaratory relief arising from the same.

JURISDICTION AND VENUE

9. Defendants are subject to the jurisdiction of this Court on the grounds that (a) one or more Defendants is a foreign corporation whose principal place of business is located in the State of New Jersey; (b) one or more Defendants is a foreign corporation that either are registered to conduct business in the State of New Jersey and have actually transacted business in New Jersey; and/or (c) one or more Defendants is a domestic corporation native to the State of New Jersey.

10. Venue is proper pursuant to R. 4:3-2 as the causes of action arose in this county.

11. Joinder of all parties is proper pursuant to R. 4:29-1. Defendants are permissively joined in this action because the exposure, injuries, and relief requested all arise out of or in respect of the same transaction, occurrence, or series of transactions or occurrences, and involves questions of law or fact common to all parties.

PARTIES

12. Plaintiff George Perez, Sr. is a resident and citizen of Barnegat Township, New Jersey. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

13. Plaintiff George Perez, Sr. was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

14. Plaintiff Henry Achey, III is a resident and citizen of Harrison, Tennessee. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

15. Plaintiff Henry Achey, III was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

16. Plaintiff Bryan Adamson is a resident and citizen of Evansville, Indiana. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

17. Plaintiff Bryan Adamson was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

18. Plaintiff Nick Aguilera is a resident and citizen of Yucaipa, California. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

19. Plaintiff Nick Aguilera was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

20. Plaintiff Marty Alexander is a resident and citizen of Bloomfield, New Mexico. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

21. Plaintiff Marty Alexander was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

22. Plaintiff Luis Alvarez Jr. is a resident and citizen of Miami, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training

and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

23. Plaintiff Luis Alvarez, Jr. was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

24. Plaintiff Gilbert Anderson, Jr. is a resident and citizen of Arlington, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

25. Plaintiff Gilbert Anderson, Jr. was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

26. Plaintiff John Anderson is a resident and citizen of West Allis, Wisconsin. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

27. Plaintiff John Anderson was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

28. Plaintiff Orscen Anderson is a resident and citizen of Mobile, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

29. Plaintiff Orscen Anderson was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

30. Plaintiff Pierre Andre is a resident and citizen of Pembroke Pines, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in

training and to extinguish fires during his working career as a military and/or civilian firefighter.

Plaintiff was also exposed to PFAS through ingestion of drinking water.

31. Plaintiff Pierre Andre was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

32. Plaintiff Roderic Anthony Perez, III is a resident and citizen of Lancaster, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

33. Plaintiff Roderick Perez, III was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

34. Plaintiff Megan Archila is a resident and citizen of Troutdale, Oregon. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

35. Plaintiff Megan Archilla was diagnosed with ulcerative colitis and thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

36. Plaintiff John Armstrong is a resident and citizen of Peoria, Illinois. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

37. Plaintiff John Armstrong was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

38. Plaintiff Allen Arneson is a resident and citizen of Elmwood, Wisconsin. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff

was also exposed to PFAS through ingestion of drinking water.

39. Plaintiff Allen Arneson was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

40. Plaintiff Bill Arnold is a resident and citizen of Vancouver, Washington. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

41. Plaintiff Bill Arnold was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

42. Plaintiff Brian Arps is a resident and citizen of Fremont, Nebraska. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

43. Plaintiff Brian Arps was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

44. Plaintiff Wesley Ashe is a resident and citizen of Hampton, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

45. Plaintiff Wesley Ashe was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

46. Plaintiff Shanonn Ashley is a resident and citizen of Hampton, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff

56. Plaintiff Kenneth Barger is a resident and citizen of Florence, Arizona. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

57. Plaintiff Kenneth Barger was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

58. Plaintiff Miles Barnes is a resident and citizen of Horseheads, New York. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

59. Plaintiff Miles Barnes was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

60. Plaintiff Randall Bass is a resident and citizen of Bauxite, Arkansas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

61. Plaintiff Randall Bass was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

62. Plaintiff Aubrey Battles is a resident and citizen of Slocumb, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

63. Plaintiff Audrey Battles was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

64. Plaintiff Brian Baumgartner is a resident and citizen of Leavenworth, Kansas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

65. Plaintiff Brian Baumgartner was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

66. Plaintiff Heather Beer is a resident and citizen of Palomar, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

67. Plaintiff Heather Beer was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

68. Plaintiff Terrell Belger is a resident and citizen of Akron, Ohio. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

69. Plaintiff Terrell Belger was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

70. Plaintiff Thomas Bench is a resident and citizen of Pocatello, Idaho. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

71. Plaintiff Thomas Bench was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

72. Plaintiff Gustavo Bendeck is a resident and citizen of Lubbock, Texas. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

73. Plaintiff Gustavo Bendeck was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

74. Plaintiff Tracie Benison is a resident and citizen of Birmingham, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

75. Plaintiff Tracie Benison was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

76. Plaintiff John Bennett is a resident and citizen of Goodyear, Arizona. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

77. Plaintiff John Bennett was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

78. Plaintiff Bruce Bergdahl is a resident and citizen of Ventura, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

79. Plaintiff Bruce Bergdahl was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

80. Plaintiff James Berger is a resident and citizen of Oceanside, California. Plaintiff regularly

used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

81. Plaintiff James Berger was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

82. Plaintiff Edwin Bermudez is a resident and citizen of North Las Vegas, Nevada. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

83. Plaintiff Edwin Bermudez was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

84. Plaintiff John Betterley is a resident and citizen of Phelps, New York. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

85. Plaintiff John Betterley was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

86. Plaintiff David Bilbrey is a resident and citizen of Lubbock, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

87. Plaintiff David Bilbrey was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

88. Plaintiff Brian Billiet is a resident and citizen of Mccalla, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also

exposed to PFAS through ingestion of drinking water.

97. Plaintiff Clyde Blades was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

98. Plaintiff Michael Blankenship is a resident and citizen of Clermont, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

99. Plaintiff Michael Blankenship was diagnosed with kidney cancer and ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

100. Plaintiff David Bloodsworth is a resident and citizen of Lorain, Ohio. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

101. Plaintiff David Bloodsworth was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

102. Plaintiff Mark Blurton is a resident and citizen of Tulia, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

103. Plaintiff Mark Blurton was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

104. Plaintiff Kim Bodeker is a resident and citizen of Madison, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff

was also exposed to PFAS through ingestion of drinking water.

105. Plaintiff Kim Bodeker was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

106. Plaintiff Michael Bohnsdahl is a resident and citizen of Wausau, Wisconsin. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

107. Plaintiff Michael Bohnsdahl was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

108. Plaintiff Joseph Boles is a resident and citizen of Jonesville, North Carolina. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

109. Plaintiff Joseph Boles was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

110. Plaintiff Christina Bonner is a resident and citizen of Longs, South Carolina. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

111. Plaintiff Christina Bonner was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

112. Plaintiff Branden Borden is a resident and citizen of Hampton, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff

was also exposed to PFAS through ingestion of drinking water.

121. Plaintiff Michael Branson was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

122. Plaintiff Robert Brazil is a resident and citizen of Benton, Arkansas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

123. Plaintiff Robert Brazil was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

124. Plaintiff Justin Brehm is a resident and citizen of Lake Neenah, Wisconsin. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

125. Plaintiff Justin Brehm was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

126. Plaintiff Billy Bridges is a resident and citizen of Vidalia, Georgia. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

127. Plaintiff Billy Bridges was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

128. Plaintiff James Brooks is a resident and citizen of Vicksburg, Mississippi. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

129. Plaintiff James Brooks was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

130. Plaintiff Darin Brown is a resident and citizen of Owatonna, Minnesota. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

131. Plaintiff Darin Brown was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

132. Plaintiff Jeffrey Brown is a resident and citizen of Deltona, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

133. Plaintiff Jeffrey Brown was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

134. Plaintiff Jimmy Brown is a resident and citizen of Gardena, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

135. Plaintiff Jimmy Brown was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

136. Plaintiff Karl Brown is a resident and citizen of Crawford, Mississippi. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

137. Plaintiff Karl Brown was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

138. Plaintiff Jeffrey Buckler is a resident and citizen of Harpursville, New York. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

139. Plaintiff Jeffrey Buckler was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

140. Plaintiff Richard Bullard is a resident and citizen of Greensboro, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

141. Plaintiff Richard Bullard was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

142. Plaintiff Terry Burdette is a resident and citizen of Scott Depot, West Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

143. Plaintiff Terry Burdette was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

144. Plaintiff Stanley Burrell is a resident and citizen of Shreveport, Louisiana. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

145. Plaintiff Stanley Burrell was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

146. Plaintiff Donald Burton is a resident and citizen of Meridian, Idaho. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

147. Plaintiff Donald Burton was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

148. Plaintiff Wayne Bush Jr is a resident and citizen of New Paris, Pennsylvania. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

149. Plaintiff Wayne Bush, Jr. was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

150. Plaintiff Phillip Bussinger is a resident and citizen of Cedar Springs, Michigan. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

151. Plaintiff Phillip Bussinger was diagnosed with kidney cancer and thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

152. Plaintiff Salvatore Calabrese is a resident and citizen of Milan, Michigan. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

153. Plaintiff Salvatore Calabrese was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

154. Plaintiff Gregory Camden is a resident and citizen of Troutville, Virginia. Plaintiff

regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

155. Plaintiff Gregory Camden was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

156. Plaintiff Jose Cantu is a resident and citizen of San Antonio, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

157. Plaintiff Jose Cantu was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

158. Plaintiff Robert Cardona is a resident and citizen of Virginia Beach, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

159. Plaintiff Robert Cardona was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

160. Plaintiff Terry Carefoot is a resident and citizen of Ephrata, Washington. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

161. Plaintiff Terry Carefoot was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

162. Plaintiff Christopher Carlson is a resident and citizen of San Antonio, Texas. Plaintiff

regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

163. Plaintiff Christopher Carlson was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

164. Plaintiff Richard Carman is a resident and citizen of Burlington, Kentucky. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

165. Plaintiff Richard Carman was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

166. Plaintiff Jesse Carmen is a resident and citizen of Lake Charles, Louisiana. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

167. Plaintiff Jesse Carmen was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

168. Plaintiff David Carmon is a resident and citizen of Madisonville, Kentucky. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

169. Plaintiff David Carmon was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

170. Plaintiff Joel Carse is a resident and citizen of Hanscom AFB, Massachusetts. Plaintiff

regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

171. Plaintiff Joel Carse was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

172. Plaintiff David Carson is a resident and citizen of Golden Valley, Arizona. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

173. Plaintiff David Carson was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

174. Plaintiff William Cartagena is a resident and citizen of Walnut, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

175. Plaintiff William Cartagena was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

176. Plaintiff Craig Carter is a resident and citizen of Twentynine Palms, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

177. Plaintiff Craig Carter was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

178. Plaintiff Gregory Catlett is a resident and citizen of Sevierville, Tennessee. Plaintiff

regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

179. Plaintiff Gregory Catlett was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

180. Plaintiff King Chancellor Jr is a resident and citizen of Krum, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

181. Plaintiff King Chancellor, Jr. was diagnosed with thyroid disease and thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

182. Plaintiff Donald Chaves is a resident and citizen of Peoria, Arizona. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

183. Plaintiff Donald Chavez was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

184. Plaintiff James Chavez, III is a resident and citizen of Murfreesboro, Tennessee. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

185. Plaintiff James Chavez, III was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

186. Plaintiff Chet Cheatham is a resident and citizen of Coss Creek, Kentucky. Plaintiff

regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

187. Plaintiff Chet Cheatam was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

188. Plaintiff Gregory Childers is a resident and citizen of Jasper, Georgia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

189. Plaintiff Gregory Childers was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

190. Plaintiff John Churchward is a resident and citizen of Tacoma, Washington. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

191. Plaintiff John Churchward was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

192. Plaintiff Samuel Cierzo is a resident and citizen of Saratoga Springs, New York. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

193. Plaintiff Samuel Cierzo was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

194. Plaintiff Lizabeth Clark is a resident and citizen of Milton, Florida. Plaintiff regularly used,

and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

195. Plaintiff Lizabeth Clark was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

196. Plaintiff Tommy Clark is a resident and citizen of Lubbock, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

197. Plaintiff Tommy Clark was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

198. Plaintiff Winston Clay is a resident and citizen of Hayes, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

199. Plaintiff Winston Clay was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

200. Plaintiff Patti Clayton is a resident and citizen of Jamul, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

201. Plaintiff Patti Clayton was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

202. Plaintiff Alonzo Cliatt is a resident and citizen of Phenix City, Alabama. Plaintiff regularly

203. Plaintiff Alonzo Cliatt was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

204. Plaintiff Gary Cochran is a resident and citizen of Howell, Michigan. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

205. Plaintiff Gary Cochran was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

206. Plaintiff Thomas Cole is a resident and citizen of Floresville, Texas. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

207. Plaintiff Thomas Cole was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

208. Plaintiff Anthony Collaso is a resident and citizen of Oceanside, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

209. Plaintiff Anthony Collaso was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

210. Plaintiff Michael Combs is a resident and citizen of Sassafras, Kentucky. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff

was also exposed to PFAS through ingestion of drinking water.

211. Plaintiff Michael Combs was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

212. Plaintiff Michael Conner is a resident and citizen of Ashford, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

213. Plaintiff Michael Conner was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

214. Plaintiff Stephen Cook is a resident and citizen of Jackson, Georgia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

215. Plaintiff Stephen Cook was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

216. Plaintiff David Coventry is a resident and citizen of Granville, Ohio. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

217. Plaintiff David Coventry was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

218. Plaintiff Anthony Cox is a resident and citizen of Elgin, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also

exposed to PFAS through ingestion of drinking water.

219. Plaintiff Anthony Cox was diagnosed with thyroid cancer and liver cancer as a result of exposure to Defendants' AFFF or TOG products.

220. Plaintiff George Cox is a resident and citizen of Los Angeles, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

221. Plaintiff George Cox was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

222. Plaintiff Patrick Cox is a resident and citizen of Corpus Christi, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

223. Plaintiff Patrick Cox was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

224. Plaintiff Stanton Crider is a resident and citizen of Grain Valley, Missouri. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

225. Plaintiff Stanton Crider was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

226. Plaintiff Alvin Cummins is a resident and citizen of Frankfort, Kentucky. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff

was also exposed to PFAS through ingestion of drinking water.

227. Plaintiff Alvin Cummings was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

228. Plaintiff Brock Cunningham is a resident and citizen of Richmond, Virginia. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

229. Plaintiff Brock Cunningham was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

230. Plaintiff Jc Edward Cunningham is a resident and citizen of Repton, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

231. Plaintiff Jc Edward Cunningham was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

232. Plaintiff Oliver Dangelo is a resident and citizen of Wilmington, Delaware. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

233. Plaintiff Oliver Dangelo was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

234. Plaintiff Michael Dannenberg is a resident and citizen of Schenectady, New York. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

235. Plaintiff Michael Dannenberg was diagnosed with kidney cancer as a result of exposure to

Defendants' AFFF or TOG products.

236. Plaintiff Frank Darby is a resident and citizen of Madison, Maine. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

237. Plaintiff Frank Darby was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

238. Plaintiff Joseph Davis is a resident and citizen of Cape Coral, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

239. Plaintiff Joseph Davis was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

240. Plaintiff Larry Davis is a resident and citizen of Knoxville, Iowa. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

241. Plaintiff Larry Davis was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

242. Plaintiff Alexander de Leon is a resident and citizen of North Highlands, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

243. Plaintiff Alexander de Leon was diagnosed with thyroid disease as a result of exposure to

Defendants' AFFF or TOG products.

244. Plaintiff Armando Delatorre is a resident and citizen of Menifee, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

245. Plaintiff Armando Delatorre was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

246. Plaintiff Gabriel DeMaio is a resident and citizen of Fort Lauderdale, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

247. Plaintiff Gabriel DeMaio was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

248. Plaintiff Donald Derossett is a resident and citizen of Batavia, Ohio. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

249. Plaintiff Donald Derossett was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

250. Plaintiff Franklin Dhom is a resident and citizen of Momence, Illinois. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

251. Plaintiff Franklin Dhom was diagnosed with kidney cancer as a result of exposure to

252. Plaintiff Richard Dice is a resident and citizen of Grants Pass, Oregon. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

254. Plaintiff Shari Dickinson is a resident and citizen of Merrill, Wisconsin. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

256. Plaintiff Richard Din is a resident and citizen of Ramona, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

258. Plaintiff Christopher Dixon is a resident and citizen of Mooresville, North Carolina. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

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Defendants' AFFF or TOG products.

260. Plaintiff Thomas Doherty is a resident and citizen of San Diego, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

261. Plaintiff Thomas Doherty was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

262. Plaintiff Joseph Dooley, Jr. is a resident and citizen of Bedford, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

263. Plaintiff Joseph Dooley, Jr. was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

264. Plaintiff Raymond Down is a resident and citizen of Milltown, Montana. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

265. Plaintiff Raymond Down was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

266. Plaintiff Ollie Dunlap is a resident and citizen of Quitman, Mississippi. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

267. Plaintiff Ollie Dunlap was diagnosed with thyroid disease a result of exposure to

Defendants' AFFF or TOG products.

268. Plaintiff Dennis Durham is a resident and citizen of Estill Springs, Tennessee. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

269. Plaintiff Dennis Durham was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

270. Plaintiff Johnny Dyson is a resident and citizen of Whitehall, Montana. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

271. Plaintiff Johnny Dyson was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

272. Plaintiff Michael Eden is a resident and citizen of Mohawk, Tennessee. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

273. Plaintiff Michael Eden was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

274. Plaintiff Robert Edwards is a resident and citizen of Brooks, Kentucky. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

275. Plaintiff Robert Edwards was diagnosed with thyroid disease as a result of exposure to

Defendants' AFFF or TOG products.

276. Plaintiff Randy Eller is a resident and citizen of Laurel Bloomery, Tennessee. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

277. Plaintiff Randy Eller was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

278. Plaintiff William Elliott is a resident and citizen of Charleston, South Carolina. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

279. Plaintiff William Elliott was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

280. Plaintiff David Ellis is a resident and citizen of Riverside, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

281. Plaintiff David Ellis was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

282. Plaintiff Mario Enriquez is a resident and citizen of Pacoima, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

283. Plaintiff Mario Enriquez was diagnosed with thyroid disease as a result of exposure to

292. Plaintiff Jeffery Farris is a resident and citizen of Lenora, West Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

293. Plaintiff Jeffery Farris was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

294. Plaintiff Donald Feathers is a resident and citizen of Johnson City, Tennessee. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

295. Plaintiff Donald Feathers was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

296. Plaintiff Richard Fike is a resident and citizen of Mays Landing, New Jersey. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

297. Plaintiff Richard Fike was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

298. Plaintiff Mike Findlay is a resident and citizen of Decatur, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

299. Plaintiff Mike Findlay was diagnosed with thyroid cancer as a result of exposure to

Defendants' AFFF or TOG products.

300. Plaintiff Dexter Florence is a resident and citizen of Mechanicsville, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

301. Plaintiff Dexter Florence was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

302. Plaintiff Alfonso Flores, Jr. is a resident and citizen of Millsboro, Delaware. Plaintiff was exposed to PFAS through ingestion of drinking water at military sites.

303. Plaintiff Alfonso Flores, Jr. was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

304. Plaintiff Douglas Fogg is a resident and citizen of Athens, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

305. Plaintiff Douglas Fogg was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

306. Plaintiff William Foley is a resident and citizen of Barboursville, West Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

307. Plaintiff William Foley was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

308. Plaintiff Jeffrey Forrester is a resident and citizen of Wylie, Texas. Plaintiff regularly used,

and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

309. Plaintiff Jeffrey Forrester was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

310. Plaintiff Gregory Fortado is a resident and citizen of San Diego, California. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

311. Plaintiff Gregory Fortado was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

312. Plaintiff Leandro Fortyz is a resident and citizen of Bronx, New York. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

313. Plaintiff Leandro Fortyz was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

314. Plaintiff Maurice Fowler is a resident and citizen of Suffolk, Virginia. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations. Plaintiff Maurice Fowler was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

315. Plaintiff Gary Fox is a resident and citizen of Quitman, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

316. Plaintiff Gary Fox was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

317. Plaintiff Albert Fritts is a resident and citizen of Suffolk, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

318. Plaintiff Albert Fritts was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

319. Plaintiff Daniel Gambler is a resident and citizen of Katy, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

320. Plaintiff Daniel Gambler was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

321. Plaintiff Perfecto Garcia is a resident and citizen of Stockton, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

322. Plaintiff Perfecto Garcia was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

323. Plaintiff Steven Gathman is a resident and citizen of Holt, Michigan. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

324. Plaintiff Steven Gathman was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

325. Plaintiff William Gaudesi is a resident and citizen of Cheyenne, Wyoming. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

326. Plaintiff William Gaudesi was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

327. Plaintiff Geoffrey Ghiandoni is a resident and citizen of Buffalo, New York. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

328. Plaintiff Geoffrey Ghiandoni was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

329. Plaintiff Michael Girard is a resident and citizen of Salina, Kansas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

330. Plaintiff Michael Girard was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

331. Plaintiff Russell Glidewell is a resident and citizen of Cabool, Missouri. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

332. Plaintiff Russell Glidewell was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

333. Plaintiff Brent Glover is a resident and citizen of Lorton, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

334. Plaintiff Brent Glover was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

335. Plaintiff James Goehring is a resident and citizen of Downey, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

336. Plaintiff James Goehring was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

337. Plaintiff Kelly Goehring is a resident and citizen of Hackensack, Minnesota. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

338. Plaintiff Kelly Goehring was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

339. Plaintiff Rudy Gonzales is a resident and citizen of Yuma, Arizona. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

340. Plaintiff Rudy Gonzales was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

341. Plaintiff Ricky Goodrich is a resident and citizen of Currie, North Carolina. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

342. Plaintiff Ricky Goodrich was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

343. Plaintiff Robert Gorgacz is a resident and citizen of Youngstown, Ohio. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

344. Plaintiff Robert Gorgacz was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

345. Plaintiff Robert Gould is a resident and citizen of New Franklin, Ohio. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

346. Plaintiff Robert Gould was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

347. Plaintiff Rodney Grady is a resident and citizen of Overland Park, Kansas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

348. Plaintiff Rodney Grady was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

349. Plaintiff Christopher Graham is a resident and citizen of Wilmington, Delaware. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

350. Plaintiff Christopher Graham was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

351. Plaintiff Damen Graham is a resident and citizen of Monroe, Louisiana. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

352. Plaintiff Damen Graham was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

353. Plaintiff Michael Grasser is a resident and citizen of Auburn, Washington. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

354. Plaintiff Michael Grasser was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

355. Plaintiff Kevin Green is a resident and citizen of Ashland, Oregon. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

356. Plaintiff Kevin Green was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

357. Plaintiff Karlton Gregson is a resident and citizen of Enumclaw, Washington. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

358. Plaintiff Karlton Gregson was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

359. Plaintiff Alma Guerrero is a resident and citizen of Hawks, Michigan. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

360. Plaintiff Alma Guerrero was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

361. Plaintiff Chuck Gurwell is a resident and citizen of Mesa, Arizona. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

362. Plaintiff Chuck Gurwell was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

363. Plaintiff Brittany Haley is a resident and citizen of Freeland, Michigan. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

364. Plaintiff Brittany Haley was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

365. Plaintiff John Haley is a resident and citizen of Bonney Lake, Washington. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

366. Plaintiff John Haley was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

367. Plaintiff Jason Hall is a resident and citizen of Atascadero, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

368. Plaintiff Jason Hall was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

369. Plaintiff Lee Hall is a resident and citizen of Holly Hill, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

370. Plaintiff Lee Hall was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

371. Plaintiff Melanie Haney is a resident and citizen of Cleveland, Georgia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

372. Plaintiff Melanie Haney was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

373. Plaintiff Stephen Hanson is a resident and citizen of Lewiston, Idaho. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

374. Plaintiff Stephen Hanson was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

375. Plaintiff Wesley Hardesty is a resident and citizen of Wellington, Nevada. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

376. Plaintiff Wesley Hardesty was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

377. Plaintiff Robert Harding is a resident and citizen of DeQueen, Arkansas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

378. Plaintiff Robert Harding was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

379. Plaintiff Thomas Hardy is a resident and citizen of Ellsworth, Maine. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/or working at military installations.

380. Plaintiff Thomas Hardy was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

381. Plaintiff Randal Hash is a resident and citizen of Gonzales, Louisiana. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

382. Plaintiff Randal Hash was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

383. Plaintiff Freddie Hawkins is a resident and citizen of Braselton, Georgia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

384. Plaintiff Freddie Hawkins was diagnosed with ulcerative colitis a result of exposure to Defendants' AFFF or TOG products.

385. Plaintiff Gregory Hayes is a resident and citizen of Gallup, New Mexico. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

386. Plaintiff Gregory Hayes was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

387. Plaintiff John Hayes is a resident and citizen of Wanatchee, Washington. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

388. Plaintiff John Hayes was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

389. Plaintiff Norman Hayward is a resident and citizen of Kent, Washington. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

390. Plaintiff Norman Hayward was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

391. Plaintiff Patrick Hazelwood is a resident and citizen of Simpsonville, South Carolina. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

392. Plaintiff Patrick Hazelwood was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

393. Plaintiff William Heald is a resident and citizen of Swanton, Vermont. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

394. Plaintiff William Heald was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

395. Plaintiff Richard Heaning is a resident and citizen of Massapequa, New York. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

396. Plaintiff Richard Heaning was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

397. Plaintiff James Henry is a resident and citizen of Venice, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

398. Plaintiff James Henry was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

399. Plaintiff Gilbert Hernandez is a resident and citizen of Las Angeles, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

400. Plaintiff Gilbert Hernandez was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

401. Plaintiff Robert Hernandez is a resident and citizen of San Diego, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

402. Plaintiff Robert Hernandez was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

403. Plaintiff William Hertz is a resident and citizen of Sparks, Nevada. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

404. Plaintiff William Hertz was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

405. Plaintiff William Hicks is a resident and citizen of Jacksonville, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

406. Plaintiff William Hicks was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

407. Plaintiff Richard Hillis is a resident and citizen of Palmetto, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

408. Plaintiff Richard Hillis was diagnosed with kidney cancer and thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

409. Plaintiff Jorge Himan is a resident and citizen of Pendergrass, Georgia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

410. Plaintiff Jorge Himan was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

411. Plaintiff Cynthia Hochhalter is a resident and citizen of Kingsport, Tennessee. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/or working at military installations.

412. Plaintiff Cynthia Hochhalter was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

413. Plaintiff George Hoening is a resident and citizen of Long Beach, California. Plaintiff was

exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

414. Plaintiff George Hoening was diagnosed with kidney cancer and thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

415. Plaintiff Keith Holding is a resident and citizen of Lompoc, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

416. Plaintiff Keith Holding was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

417. Plaintiff Anthony Holliday is a resident and citizen of Mobile, Alabama. Plaintiff regularly used, and was thereby directly exposed to, AFFF and TOG in training and to exatinguish fires during his working career as a military and/or civilian firefighter.

418. Plaintiff Anthony Holliday was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

419. Plaintiff Thomas Holmquist, Sr. is a resident and citizen of Mallory, New York. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

420. Plaintiff Thomas Holmquist, Sr. was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

421. Plaintiff Terry Hood is a resident and citizen of Crosby, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was

also exposed to PFAS through ingestion of drinking water.

422. Plaintiff Terry Hood was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

423. Plaintiff Salina Hoover is a resident and citizen of Lancaster, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

424. Plaintiff Salina Hoover was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

425. Plaintiff Geoffrey Howe is a resident and citizen of Rochester, New York. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

426. Plaintiff Geoffrey Howe was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

427. Plaintiff Russell Howes is a resident and citizen of Smith River, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

428. Plaintiff Russell Howes was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

429. Plaintiff Robert Hoyvald is a resident and citizen of Dagsboro, Delaware. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian

firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

430. Plaintiff Robert Hoyvald was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

431. Plaintiff Donald Hughes is a resident and citizen of Chillicothe, Ohio. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

432. Plaintiff Donald Hughes was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

433. Plaintiff Perrywinn Hunt is a resident and citizen of Culleoka, Tennessee. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

434. Plaintiff Perrywinn Hunt was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

435. Plaintiff Charles K. Jackson is a resident and citizen of Texas City, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

436. Plaintiff Charles K. Jackson was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

437. Plaintiff George Jackson is a resident and citizen of Centralia, Illinois. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

438. Plaintiff George Jackson was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

439. Plaintiff James Jezak is a resident and citizen of Grand Saline, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

440. Plaintiff James Jezak was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

441. Plaintiff Erran Johnson is a resident and citizen of Birmingham, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

442. Plaintiff Erran Johnson was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

443. Plaintiff Gary Johnson is a resident and citizen of Las Vegas, Nevada. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

444. Plaintiff Gary Johnson was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

445. Plaintiff Joe Johnson, Jr. is a resident and citizen of Little Rock, Arkansas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

446. Plaintiff Joe Johnson, Jr. was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

447. Plaintiff Kenneth Johnson is a resident and citizen of Los Angeles, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

448. Plaintiff Kenneth Johnson was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

449. Plaintiff Richard Johnson is a resident and citizen of Kingsley, Michigan. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

450. Plaintiff Richard Johnson was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

451. Plaintiff Travis Johnson is a resident and citizen of Monroe, Louisiana. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

452. Plaintiff Travis Johnson was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

453. Plaintiff Wendell Johnson is a resident and citizen of Baton Rouge, Louisiana. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

454. Plaintiff Wendell Johnson was diagnosed with thyroid disease as a result of exposure to

Defendants' AFFF or TOG products.

455. Plaintiff Jesse Jones, Jr. is a resident and citizen of Danville, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

456. Plaintiff Jesse Jones, Jr. was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

457. Plaintiff Michael Jones is a resident and citizen of Roseville, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

458. Plaintiff Michael Jones was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

459. Plaintiff Sidney Jones is a resident and citizen of Birmingham, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

460. Plaintiff Sidney Jones was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

461. Plaintiff Ezequiel Jurado is a resident and citizen of Mission, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

462. Plaintiff Ezequiel Jurado was diagnosed with thyroid cancer as a result of exposure to

Defendants' AFFF or TOG products.

463. Plaintiff Martin Kapp is a resident and citizen of Howard, Ohio. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

464. Plaintiff Martin Kapp was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

465. Plaintiff Rhonda Kastner is a resident and citizen of Longview, Washington. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

466. Plaintiff Ronda Kastner was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

467. Plaintiff Amir Kazemi is a resident and citizen of Houston, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

468. Plaintiff Amir Kazemi was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

469. Plaintiff Michael Keith is a resident and citizen of Quaker Hill, Connecticut. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

470. Plaintiff Michael Keith was diagnosed with kidney cancer as a result of exposure to

Defendants' AFFF or TOG products.

471. Plaintiff Jeffrey Kelley is a resident and citizen of Rainelle, West Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

472. Plaintiff Jeffrey Kelley was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

473. Plaintiff Joseph Ketchum is a resident and citizen of San Antonio, Texas. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

474. Plaintiff Joseph Ketchum was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

475. Plaintiff Ronald Killen is a resident and citizen of Camden Wyoming, Delaware. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

476. Plaintiff Ronald Killen was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

477. Plaintiff Christopher Kinch is a resident and citizen of North Providence, Rhode Island. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

478. Plaintiff Christopher Kinch was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

479. Plaintiff Joseph King is a resident and citizen of Chicago, Illinois. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

480. Plaintiff Joseph King was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

481. Plaintiff Alan Kirkland is a resident and citizen of Camp Hill, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

482. Plaintiff Alan Kirkland was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

483. Plaintiff Joseph Klapperich is a resident and citizen of Cape Coral, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

484. Plaintiff Joseph Klapperich was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

485. Plaintiff John Klinginsmith is a resident and citizen of Marysville, Washington. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

486. Plaintiff John Klinginsmith was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

487. Plaintiff John Knight is a resident and citizen of Bakersfield, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

488. Plaintiff John Knight was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

489. Plaintiff Wendy Koenig is a resident and citizen of Saint Louis, Missouri. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

490. Plaintiff Wendy Koenig was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

491. Plaintiff Gregory Kohler is a resident and citizen of Cridersville, Ohio. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

492. Plaintiff Gregory Kohler was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

493. Plaintiff Joseph Krewko is a resident and citizen of Pawtucket, Rhode Island. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

494. Plaintiff Joseph Krewko was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

495. Plaintiff Leonard Krupski is a resident and citizen of Jacksonville, Florida. Plaintiff

regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

496. Plaintiff Leonard Krupski was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

497. Plaintiff Louis Labella is a resident and citizen of Land O Lakes, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

498. Plaintiff Louis Labella was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

499. Plaintiff Thomas Lamb is a resident and citizen of Chesapeake, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

500. Plaintiff Thomas Lamb was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

501. Plaintiff Paul Lampasso is a resident and citizen of Brooksville, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

502. Plaintiff Paul Lampasso was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

503. Plaintiff Kenneth Langley is a resident and citizen of Alameda, New Mexico. Plaintiff

regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

504. Plaintiff Kenneth Langley was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

505. Plaintiff Jennifer LaParr is a resident and citizen of Brantingham, New York. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

506. Plaintiff Jennifer LaParr was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

507. Plaintiff Lalea Lazar is a resident and citizen of Everton, Missouri. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

508. Plaintiff Lalea Lazar was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

509. Plaintiff Mildred Lee is a resident and citizen of Big Bear City, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

510. Plaintiff Mildred Lee was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

511. Plaintiff Joseph Lemanek is a resident and citizen of Clyde, North Carolina. Plaintiff

regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

520. Plaintiff Arturo Lopez was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

521. Plaintiff Larry Lopez is a resident and citizen of Vista, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

522. Plaintiff Larry Lopez was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

523. Plaintiff Miguel Lopez is a resident and citizen of Clifton, Colorado. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

524. Plaintiff Miguel Lopez was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

525. Plaintiff Jason Loyd is a resident and citizen of Greenwood, Indiana. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

526. Plaintiff Jason Loyd was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

527. Plaintiff Paul Lucero is a resident and citizen of Lakewood, California. Plaintiff was

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Plaintiff was also exposed to PFAS through ingestion of drinking water.

536. Plaintiff Wendell Lynch was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

537. Plaintiff Danielle Lynn is a resident and citizen of Cary, North Carolina. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

538. Plaintiff Danielle Lynn was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

539. Plaintiff Michael Lyon is a resident and citizen of Sunrise, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

540. Plaintiff Michael Lyon was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

541. Plaintiff Thomas MacFarlan is a resident and citizen of Kintnersville, Pennsylvania. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

542. Plaintiff Thomas MacFarlan was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

543. Plaintiff Alan Machiela is a resident and citizen of Fountain, Michigan. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

544. Plaintiff Alan Machiela was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

545. Plaintiff Michael Mackenzie is a resident and citizen of Chiefland, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

546. Plaintiff Michael Mackenzie was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

547. Plaintiff Charles Maddox, III is a resident and citizen of Brandywine, Maryland. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

548. Plaintiff Charles Maddox III, was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

549. Plaintiff Frank Majors is a resident and citizen of Atlanta, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

550. Plaintiff Frank Majors was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

551. Plaintiff Chris Mallaburn is a resident and citizen of Star, Idaho. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

552. Plaintiff Chris Mallaburn was diagnosed with kidney cancer as a result of exposure to

Defendants' AFFF or TOG products.

553. Plaintiff Vincent Marinaccio is a resident and citizen of Barto, Pennsylvania. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

554. Plaintiff Vincent Marinaccio was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

555. Plaintiff Harry Martin, III is a resident and citizen of West Jefferson, North Carolina. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

556. Plaintiff Harry Martin, III was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

557. Plaintiff Robert Martin is a resident and citizen of Ronkonkoma, New York. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

558. Plaintiff Robert Martin was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

559. Plaintiff Gerardo Martinez is a resident and citizen of Pearland, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

560. Plaintiff Gerardo Martinez was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

561. Plaintiff Joseph Martinez is a resident and citizen of Horizon City, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

562. Plaintiff Joseph Martinez was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

563. Plaintiff David Mausling is a resident and citizen of Perris, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

564. Plaintiff David Mausling was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

565. Plaintiff Donald McCann is a resident and citizen of Corte Madera, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

566. Plaintiff Donald McCann was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

567. Plaintiff Dale McClure is a resident and citizen of Ocala, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

568. Plaintiff Dale McClure was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

577. Plaintiff Felipe Mendoza is a resident and citizen of Paramount, California. Plaintiff

regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

578. Plaintiff Felipe Mendoza was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

579. Plaintiff Marielena Mendoza is a resident and citizen of Murrieta, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

580. Plaintiff Marielena Mendoza was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

581. Plaintiff Reid Metcalf is a resident and citizen of Gilbertsville, Kentucky. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

582. Plaintiff Reid Metcalf was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

583. Plaintiff Ray Miley is a resident and citizen of Ossining, New York. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

584. Plaintiff Ray Miley was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

585. Plaintiff Jennifer Miller is a resident and citizen of Fairfield, California. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military

installations.

586. Plaintiff Jennifer Miller was diagnosed with thyroid disease and thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

587. Plaintiff Roger Miller is a resident and citizen of Eau Claire, Wisconsin. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

588. Plaintiff Roger Miller was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

589. Plaintiff Tracy Miller is a resident and citizen of San Jose, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

590. Plaintiff Tracy Miller was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

591. Plaintiff Melissa Millwood is a resident and citizen of Decatur, Tennessee. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

592. Plaintiff Melissa Millwood was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

593. Plaintiff Michael Milroy is a resident and citizen of Ramona, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

595. Plaintiff Gene Miltner is a resident and citizen of Bartlett, Tennessee. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

597. Plaintiff James Moman is a resident and citizen of Gardendale, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

599. Plaintiff Joseph Moore is a resident and citizen of Quartz Hill, California. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

601. Plaintiff Robert Moore is a resident and citizen of Noble, Oklahoma. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

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Defendants' AFFF or TOG products.

603. Plaintiff Samuel Morin is a resident and citizen of Hedgesville, West Virginia. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

604. Plaintiff Samuel Morin was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

605. Plaintiff Gary Moring is a resident and citizen of Plainview, New York. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

606. Plaintiff Gary Moring was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

607. Plaintiff Pete Morrison is a resident and citizen of Bostic, North Carolina. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

608. Plaintiff Pete Morrison was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

609. Plaintiff Mary Morrow is a resident and citizen of Ocala, Florida. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

610. Plaintiff Mary Morrow was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

611. Plaintiff Dustin Murray is a resident and citizen of Weatherford, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training

and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

612. Plaintiff Dustin Murray diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

613. Plaintiff Mark Napoles is a resident and citizen of Bishop, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

614. Plaintiff Mark Napoles was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

615. Plaintiff Timmie Nassif is a resident and citizen of Virginia Beach, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

616. Plaintiff Timmie Nassif was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

617. Plaintiff Thomas Nelson is a resident and citizen of Hugo, Minnesota. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

618. Plaintiff Thomas Nelson was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

619. Plaintiff Alvin Neumann is a resident and citizen of Navasota, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

620. Plaintiff Alvin Neumann was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

621. Plaintiff Daniel Nichols is a resident and citizen of Denmark, Wisconsin. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

622. Plaintiff Daniel Nichols was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

623. Plaintiff Richard Nielsen is a resident and citizen of Pensacola, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

624. Plaintiff Richard Nielsen was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

625. Plaintiff Rod Nijim is a resident and citizen of Chico, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

626. Plaintiff Rod Nijim was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

627. Plaintiff Ronald Norman is a resident and citizen of Rocky Face, Georgia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

628. Plaintiff Ronald Norman was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

629. Plaintiff Curtis Nuckles is a resident and citizen of Lafayette, Colorado. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

630. Plaintiff Curtis Nuckles was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

631. Plaintiff Terry Nylund is a resident and citizen of Las Cruces, New Mexico. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

632. Plaintiff Terry Nylund was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

633. Plaintiff Martin Oakley is a resident and citizen of Fairland, Oklahoma. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

634. Plaintiff Martin Oakley was diagnosed with kidney cancer and thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

635. Plaintiff John Oldfather is a resident and citizen of Peru, Indiana. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

636. Plaintiff John Oldfather was diagnosed with kidney cancer as a result of exposure to

Defendants' AFFF or TOG products.

637. Plaintiff Walter Oldham is a resident and citizen of Bartlett, Tennessee. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

638. Plaintiff Walter Oldham was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

639. Plaintiff James Lellen Oody is a resident and citizen of Loudon, Tennessee. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

640. Plaintiff James Lellen Oody was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

641. Plaintiff Walter Osterberg, Jr. is a resident and citizen of Brookings, South Dakota. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

642. Plaintiff Walter Osterberg, Jr. was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

643. Plaintiff Mitchell Ott is a resident and citizen of Fremont, Nebraska. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

644. Plaintiff Mitchell Ott was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

645. Plaintiff James Overturf is a resident and citizen of Gillham, Arkansas. Plaintiff regularly

used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

646. Plaintiff James Overturf was diagnosed with kidney cancer and ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

647. Plaintiff Charles Owen is a resident and citizen of Star, Idaho. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

648. Plaintiff Charles Owen was diagnosed with kidney cancer and ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

649. Plaintiff Eric Pacheco is a resident and citizen of New Buffalo, Michigan. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

650. Plaintiff Eric Pacheco was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

651. Plaintiff Clifton Pappion, Jr. is a resident and citizen of Lake Charles, Louisiana. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

652. Plaintiff Clifton Pappion, Jr. was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

653. Plaintiff David Park is a resident and citizen of West Hollywood, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training

and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

654. Plaintiff David Park was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

655. Plaintiff Jason Patrylo is a resident and citizen of Emmaus, Pennsylvania. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

656. Plaintiff Jason Patrylo was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

657. Plaintiff Steve Patterson is a resident and citizen of Centerville, Utah. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

658. Plaintiff Steve Patterson was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

659. Plaintiff James Paulette is a resident and citizen of Vivian, Louisiana. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

660. Plaintiff James Paulette was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

661. Plaintiff Donald Payne is a resident and citizen of Birmingham, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

662. Plaintiff Donald Payne was diagnosed with ulcerative colitis as a result of exposure to

Defendants' AFFF or TOG products.

663. Plaintiff Randy Payne is a resident and citizen of Anderson, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

664. Plaintiff Randy Payne was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

665. Plaintiff Temper Payne is a resident and citizen of Coleraine, Minnesota. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

666. Plaintiff Temper Payne was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

667. Plaintiff Patrick Pearce is a resident and citizen of Collinsville, Illinois. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

668. Plaintiff Patrick Pearce was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

669. Plaintiff Eric Petty is a resident and citizen of Kenai, Alaska. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

670. Plaintiff Eric Petty was diagnosed with thyroid disease as a result of exposure to

671. Plaintiff Justin Pickler is a resident and citizen of Yulee, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

673. Plaintiff Jeffrey Pluff is a resident and citizen of Winter Haven, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

675. Plaintiff Robert Polacek is a resident and citizen of Columbus, Ohio. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

677. Plaintiff Francis Poling, Jr. is a resident and citizen of Venice, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

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687. Plaintiff Neal Powell was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

688. Plaintiff Gregory Prange is a resident and citizen of Keytesville, Missouri. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

689. Plaintiff Gregory Prange was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

690. Plaintiff Kevin Prokop is a resident and citizen of Butler, Pennsylvania. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

691. Plaintiff Kevin Prokop was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

692. Plaintiff Joseph Pruitt is a resident and citizen of Kellyville, Oklahoma. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

693. Plaintiff Joseph Pruitt was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

694. Plaintiff Raymond Pullen, Jr. is a resident and citizen of Silver Point, Tennessee. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

695. Plaintiff Raymond Pullen, Jr. was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

696. Plaintiff Ronald Pumphrey is a resident and citizen of Crawfordville, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

697. Plaintiff Ronald Pumphrey was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

698. Plaintiff Vincent Quintana is a resident and citizen of El Paso, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

699. Plaintiff Vincent Quintana was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

700. Plaintiff Thomas Rainey is a resident and citizen of Petersburg, Indiana. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

701. Plaintiff Thomas Rainey was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

702. Plaintiff David Ramos is a resident and citizen of El Paso, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

703. Plaintiff David Ramos was diagnosed with thyroid disease and thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

704. Plaintiff Marshall Ramsey is a resident and citizen of Hampton, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

705. Plaintiff Marshall Ramsey was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

706. Plaintiff Frank Randall is a resident and citizen of Elizabeth, Illinois. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

707. Plaintiff Frank Randall was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

708. Plaintiff Joseph Reyes is a resident and citizen of Lee's Summit, Missouri. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

709. Plaintiff Joseph Reyes was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

710. Plaintiff Michael Ricciardi is a resident and citizen of Hamilton Township, New Jersey. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

711. Plaintiff Michael Ricciardi was diagnosed with testicular cancer as a result of exposure to

Defendants' AFFF or TOG products.

712. Plaintiff Steven Rich is a resident and citizen of Tamarac, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

713. Plaintiff Steven Rich was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

714. Plaintiff Tommy Richards is a resident and citizen of Bowling Green, Kentucky. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

715. Plaintiff Tommy Richards was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

716. Plaintiff Linda Richardson is a resident and citizen of Lueders, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

717. Plaintiff Linda Richardson was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

718. Plaintiff Kenneth Richey is a resident and citizen of Hobbs, New Mexico. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

719. Plaintiff Kenneth Richey was diagnosed with kidney cancer as a result of exposure to

Defendants' AFFF or TOG products.

720. Plaintiff Allen Richter is a resident and citizen of Shelton, Washington. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

721. Plaintiff Allen Richter was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

722. Plaintiff Richard Riel is a resident and citizen of Converse, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

723. Plaintiff Richard Riel was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

724. Plaintiff Michael Rienzo is a resident and citizen of Dover, New Hampshire. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

725. Plaintiff Michael Rienzo was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

726. Plaintiff Bill Riley is a resident and citizen of Stone Mountain, Georgia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

727. Plaintiff Bill Riley was diagnosed with kidney cancer as a result of exposure to Defendants'

AFFF or TOG products.

728. Plaintiff Ervin Roberson is a resident and citizen of Ludowici, Georgia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

729. Plaintiff Ervin Roberson was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

730. Plaintiff Stephen Roberts is a resident and citizen of Denham Springs, Louisiana. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

731. Plaintiff Stephen Roberts was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

732. Plaintiff Stephen Rosenthal is a resident and citizen of Litchfield Park, Arizona. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

733. Plaintiff Stephen Rosenthal was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

734. Plaintiff Edward Roth, Sr. is a resident and citizen of Moncks Corner, South Carolina. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

735. Plaintiff Edward Roth, Sr. was diagnosed with testicular cancer as a result of exposure to

Defendants' AFFF or TOG products.

736. Plaintiff Ronald Rouse is a resident and citizen of New Plymouth, Idaho. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

737. Plaintiff Ronald Rouse was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

738. Plaintiff Sylvester Rush is a resident and citizen of Florence, South Carolina. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

739. Plaintiff Sylvester Rush was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

740. Plaintiff Lawrence Russell is a resident and citizen of Tyler, Texas. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

741. Plaintiff Lawrence Russell was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

742. Plaintiff Nathan Russell is a resident and citizen of Oceanside, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

743. Plaintiff Nathan Russell was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

744. Plaintiff Cristian Sanchez is a resident and citizen of Santa Paula, California. Plaintiff was

exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

745. Plaintiff Cristian Sanchez was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

746. Plaintiff John Santistevan is a resident and citizen of Deming, New Mexico. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

747. Plaintiff John Santistevan was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

748. Plaintiff Henry Santo is a resident and citizen of Newport Beach, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

749. Plaintiff Henry Santo was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

750. Plaintiff Jose Santos is a resident and citizen of Sacramento, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

751. Plaintiff Jose Santos was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

752. Plaintiff William Savage, Jr. is a resident and citizen of Menifee, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in

training and to extinguish fires during his working career as a military and/or civilian firefighter.

Plaintiff was also exposed to PFAS through ingestion of drinking water.

753. Plaintiff William Savage, Jr. was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

754. Plaintiff Joseph Schiavone is a resident and citizen of Minooka, Illinois. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

755. Plaintiff Joseph Schiavone was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

756. Plaintiff Daniel Schimmel is a resident and citizen of Erie, Pennsylvania. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

757. Plaintiff Daniel Schimmel was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

758. Plaintiff Frank Schneider is a resident and citizen of Massillon, Ohio. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

759. Plaintiff Frank Schneider was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

760. Plaintiff Daniel Scott is a resident and citizen of Alexandria, Louisiana. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training

761. Plaintiff Daniel Scott was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

762. Plaintiff Steven Seamons is a resident and citizen of Idaho Falls, Idaho. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

763. Plaintiff Steven Seamons was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

764. Plaintiff Carson Shaffer is a resident and citizen of Christmas, Florida. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

765. Plaintiff Carson Shaffer was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

766. Plaintiff Jason Shead is a resident and citizen of League City, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

767. Plaintiff Jason Shead was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

768. Plaintiff William Shearer is a resident and citizen of Elizabeth City, North Carolina. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian

firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

769. Plaintiff William Shearer was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

770. Plaintiff William Shelton is a resident and citizen of Roseville, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

771. Plaintiff William Shelton was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

772. Plaintiff Charles Simmons is a resident and citizen of Tivoli, New York. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

773. Plaintiff Charles Simmons was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

774. Plaintiff Anthony Simon is a resident and citizen of Mobile, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

775. Plaintiff Anthony Simon was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

776. Plaintiff Doris Simons is a resident and citizen of Justin, Texas. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

777. Plaintiff Doris Simons was diagnosed with thyroid disease as a result of exposure to

Defendants' AFFF or TOG products.

778. Plaintiff David Sizemore is a resident and citizen of Henrietta, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

779. Plaintiff David Sizemore was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

780. Plaintiff Benjamin Smith is a resident and citizen of Springfield, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

781. Plaintiff Benjamin Smith was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

782. Plaintiff Danny Smith is a resident and citizen of Fayetteville, North Carolina. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

783. Plaintiff Danny Smith was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

784. Plaintiff Jacob Smith is a resident and citizen of Bradenton, Florida. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

785. Plaintiff Jacob Smith was diagnosed with thyroid disease as a result of exposure to

Defendants' AFFF or TOG products.

786. Plaintiff Lawrence Smith is a resident and citizen of Pinson, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

787. Plaintiff Lawrence Smith was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

788. Plaintiff Michael A. Smith is a resident and citizen of Waldorf, Maryland. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

789. Plaintiff Michael A. Smith was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

790. Plaintiff David Snook is a resident and citizen of Renton, Washington. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

791. Plaintiff David Snook was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

792. Plaintiff Joseph Sparrow, IV is a resident and citizen of Effort, Pennsylvania. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

793. Plaintiff Joseph Sparrow, IV was diagnosed with testicular cancer as a result of exposure

to Defendants' AFFF or TOG products.

794. Plaintiff John Spraggins is a resident and citizen of Huntsville, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

795. Plaintiff John Spraggins was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

796. Plaintiff Russell Spruill is a resident and citizen of Kansas City, Missouri. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

797. Plaintiff Russell Spruill was diagnosed with thyroid disease and thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

798. Plaintiff Pierre St. Germain is a resident and citizen of San Diego, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

799. Plaintiff Pierre St. Germain was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

800. Plaintiff Terri Stephens is a resident and citizen of St. Helens, Oregon. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

801. Plaintiff Terri Stephens was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

802. Plaintiff David Stetson is a resident and citizen of Portsmouth, New Hampshire. Plaintiff

regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

803. Plaintiff David Stetson was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

804. Plaintiff Jimmy Stewart is a resident and citizen of Bakersfield, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

805. Plaintiff Jimmy Stewart was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

806. Plaintiff John Stewart is a resident and citizen of Lynchburg, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

807. Plaintiff John Stewart was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

808. Plaintiff Larry Stewart is a resident and citizen of Johnson City, Tennessee. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

809. Plaintiff Larry Stewart was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

810. Plaintiff Thomas Stockdale is a resident and citizen of Vidalia, Georgia. Plaintiff regularly

used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

811. Plaintiff Thomas Stockdale was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

812. Plaintiff Sandra Stoddard is a resident and citizen of Santa Rosa, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

813. Plaintiff Sandra Stoddard was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

814. Plaintiff David Sullivan is a resident and citizen of Skaneateles, New York. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

815. Plaintiff David Sullivan was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

816. Plaintiff Jack Sullivan is a resident and citizen of Ranburne, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

817. Plaintiff Jack Sullivan was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

818. Plaintiff Melissa Surkamer is a resident and citizen of San Antonio, Texas. Plaintiff was

exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

819. Plaintiff Melissa Surkamer was diagnosed with thyroid cancer as a result of exposure to Defendants' AFFF or TOG products.

820. Plaintiff Gary Swain is a resident and citizen of Clayton, North Carolina. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

821. Plaintiff Gary Swain was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

822. Plaintiff Jese Sweeney is a resident and citizen of Crescent City, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

823. Plaintiff Jese Sweeney was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

824. Plaintiff Jerry Switzer is a resident and citizen of West Linn, Oregon. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

825. Plaintiff Jerry Switzer was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

826. Plaintiff Michael Talik is a resident and citizen of London, Ohio. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to

extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

827. Plaintiff Michael Talik was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

828. Plaintiff Elijah Taylor is a resident and citizen of Grand Prairie, Texas. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

829. Plaintiff Elijah Taylor was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

830. Plaintiff John Taylor is a resident and citizen of Virginia Beach, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

831. Plaintiff John Taylor was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

832. Plaintiff Jessica Thomas is a resident and citizen of Cordova, Tennessee. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

833. Plaintiff Jessica Thomas was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

834. Plaintiff Robert Thomas is a resident and citizen of Dothan, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

835. Plaintiff Robert Thomas was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

836. Plaintiff Christopher Townsend is a resident and citizen of Anchorage, Alaska. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

837. Plaintiff Christopher Townsend was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

838. Plaintiff Walter Traugh is a resident and citizen of Fairmont, West Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

839. Plaintiff Walter Traugh was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

840. Plaintiff Joshua Truesdell is a resident and citizen of Visalia, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

841. Plaintiff Joshua Truesdell was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

842. Plaintiff Scot Tucker is a resident and citizen of Fresno, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

843. Plaintiff Scot Tucker was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

844. Plaintiff Rich Turner is a resident and citizen of Chicago, Illinois. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

845. Plaintiff Rich Turner was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

846. Plaintiff Tim Van Engelenhoven is a resident and citizen of Fort Wayne, Indiana. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

847. Plaintiff Tim Van Engelenhoven was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

848. Plaintiff Wilson Velez is a resident and citizen of St Marys, Georgia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

849. Plaintiff Wilson Velez was diagnosed with liver cancer as a result of exposure to Defendants' AFFF or TOG products.

850. Plaintiff Robert Venesky is a resident and citizen of Kittanning, Pennsylvania. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

851. Plaintiff Robert Venesky was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

852. Plaintiff Trina Vian is a resident and citizen of Westford, Massachusetts. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

853. Plaintiff Trina Vian was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

854. Plaintiff Casey Vickers is a resident and citizen of Whigham, Georgia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

855. Plaintiff Casey Vickers was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

856. Plaintiff Ruben Villanueva, Jr. is a resident and citizen of Salinas, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

857. Plaintiff Ruben Villanueva, Jr. was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

858. Plaintiff Shannon Wagner is a resident and citizen of Washington, DC. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

859. Plaintiff Shannon Wagner was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

860. Plaintiff Brian Walker is a resident and citizen of Columbia City, Indiana. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in

training and to extinguish fires during his working career as a military and/or civilian firefighter.

Plaintiff was also exposed to PFAS through ingestion of drinking water.

861. Plaintiff Brain Walker was diagnosed with testicular cancer as a result of exposure to Defendants' AFFF or TOG products.

862. Plaintiff Christopher Walker is a resident and citizen of Simpsonville, South Carolina. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

863. Plaintiff Christopher Walker was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

864. Plaintiff Donald Wallace is a resident and citizen of Lafayette, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

865. Plaintiff Donald Wallace was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

866. Plaintiff Robert Walette is a resident and citizen of Shreveport, Louisiana. Plaintiff is a resident and citizen of. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

867. Plaintiff Robert Walette was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

868. Plaintiff William Ward is a resident and citizen of Springville, Alabama. Plaintiff regularly

used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

869. Plaintiff William Ward was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

870. Plaintiff Larry Washington is a resident and citizen of Murphy, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

871. Plaintiff Larry Washington was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

872. Plaintiff Latrista Weatherspoon is a resident and citizen of Phenix City, Alabama. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

873. Plaintiff Latrista Weatherspoon was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

874. Plaintiff Todd Whitcomb is a resident and citizen of Hastings, Nebraska. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

875. Plaintiff Todd Whitcomb was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

876. Plaintiff Walker White is a resident and citizen of Princeton, West Virginia. Plaintiff

885. Plaintiff Benjamin Williams was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

886. Plaintiff John Williams is a resident and citizen of Raceland, Kentucky. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

887. Plaintiff John Williams was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

888. Plaintiff James Williams, Jr. is a resident and citizen of Memphis, Tennessee. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

889. Plaintiff James Williams, Jr. was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

890. Plaintiff Michael Williams is a resident and citizen of Marietta, Oklahoma. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

891. Plaintiff Michael Williams was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

892. Plaintiff William Wilson, Jr. is a resident and citizen of Boulder City, Nevada. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

893. Plaintiff William Wilson, Jr. was diagnosed with ulcerative colitis as a result of exposure to Defendants' AFFF or TOG products.

894. Plaintiff Bernd Winderlich is a resident and citizen of Greenwood, Indiana. Plaintiff was exposed to PFAS through ingestion of drinking water while living and/ or working at military installations.

895. Plaintiff Bernd Winderlich was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

896. Plaintiff Tinisha Witt is a resident and citizen of Portsmouth, Virginia. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during her working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

897. Plaintiff Tinisha Witt was diagnosed with thyroid disease as a result of exposure to Defendants' AFFF or TOG products.

898. Plaintiff Gregory Zanetell is a resident and citizen of Kingwood, Texas. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

899. Plaintiff Gregory Zanetell was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

900. Plaintiff Vernon Zimmerman is a resident and citizen of Marysville, Washington. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

901. Plaintiff Vernon Zimmerman was diagnosed with thyroid disease as a result of exposure to

Defendants' AFFF or TOG products.

902. Plaintiff Robert Zouse is a resident and citizen of Alpine, California. Plaintiff regularly used, and was thereby exposed to, AFFF containing PFAS and TOG containing PFAS in training and to extinguish fires during his working career as a military and/or civilian firefighter. Plaintiff was also exposed to PFAS through ingestion of drinking water.

903. Plaintiff Robert Zouse was diagnosed with kidney cancer as a result of exposure to Defendants' AFFF or TOG products.

904. Defendants are designers, marketers, developers, manufacturers, distributors, releasers, instructors, promoters and sellers of PFAS-containing AFFF products or underlying PFAS containing chemicals used in AFFF production, or PFAS containing turnout gear or underlying PFAS containing chemicals used in turnout gear production. The following Defendants, at all times relevant to this lawsuit, manufactured, designed, marketed, distributed, released, instructed, promoted and/or otherwise sold (directly or indirectly) PFAS-containing AFFF or TOG products to various locations for use in fighting Class B fires such that each Defendant knew or should have known said products would be delivered to areas for active use by Plaintiffs during the course of training and firefighting activities.

905. Defendant, 3M Company, f/k/a Minnesota Mining and Manufacturing Company, ("3M"), is a Delaware corporation and does business throughout the United States. 3M has its principal place of business at 3M Center, St. Paul, Minnesota 55133.

906. 3M designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled

and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

907. Defendant AGC Chemicals Americas, Inc. ("AGC") is a Delaware corporation and does business throughout the United States. AGC has its principal place of business at 55 E. Uwchlan Ave., Suite 201, Exton, Pennsylvania 19341.

908. AGC designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

909. Defendant Amerex Corporation ("Amerex") is an Alabama corporation and does business throughout the United States. Amerex has its principal place of business at 7595 Gadsden Highway, Trussville, Alabama 35173.

910. Amerex designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

911. Defendant Archroma U.S. Inc. ("Archroma") is a North Carolina company and does business throughout the United States. Archroma has its principal place of business at 5435 77

Center Drive, #10 Charlotte, North Carolina 28217. Upon information and belief, Archroma was formed in 2013 as part of the acquisition of Clariant Corporation's Textile Chemicals, Paper Specialties and Emulsions business by SK Capital Partners.

912. Archroma designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

913. Defendant Arkema, Inc. ("Arkema") is a Pennsylvania corporation and does business throughout the United States. Arkema has its principal place of business at 900 1st Avenue, King of Prussia, Pennsylvania 19406. Upon information and belief, assets of Arkema's fluorochemical business were purchased by Defendant Dupont in 2002.

914. Arkema designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

915. Defendant BASF Corporation ("BASF"), is a Delaware corporation doing business throughout the United States. BASF Corporation has its principal place of business at 100 Park Ave., Florham Park, New Jersey 07932.

916. BASF is successor-in-interest to Ciba-Geigy Corp. and Ciba Inc., which manufactured fluorosurfactants for AFFF manufacturers who designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

917. Defendant Buckeye Fire Equipment Company ("Buckeye") is an Ohio corporation and does business throughout the United States. Buckeye has its principal place of business at 110 Kings Road, Mountain, North Carolina 28086.

918. Buckeye designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

919. Defendant Carrier Global Corporation ("Carrier") is a Delaware corporation and does business throughout the United States. Carrier has its principal place of business at 13995 Pasteur Boulevard, Palm Beach Gardens, Florida 33418. Upon information and belief, Carrier was formed in 2020 and is the parent company of Kidde-Fenwal, Inc., a manufacturer of AFFF.

920. Carrier designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF

containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

921. Defendant ChemDesign Products, Inc. ("ChemDesign") is a Texas corporation and does business throughout the United States. ChemDesign has its principal place of business at 2 Stanton Street, Marinette, Wisconsin 54143.

922. ChemDesign designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

923. Defendant Chemguard, Inc. ("Chemguard") is a Wisconsin corporation and does business throughout the United States. Chemguard has its principal place of business at One Stanton Street, Marinette, Wisconsin 54143.

924. Chemguard designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use

in firefighting.

925. Defendant Chemicals, Inc. ("Chemicals") is a Texas corporation and does business throughout the United States. Chemicals has its principal place of business at 12321 Hatcherville Road, Baytown, Texas 77521.

926. Chemicals designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

927. Defendant The Chemours Company ("Chemours"), is a Delaware corporation and does business throughout the United States. Chemours has its principal place of business 1007 Market Street, Wilmington, Delaware 19898. Upon information and belief, Chemours was spun off from DuPont in 2015 to assume PFAS related liabilities.

928. Chemours designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

929. Defendant Chemours Company FC, LLC ("Chemours FC"), is a Delaware corporation and does business throughout the United States. Chemours has its principal place of business at 1007 Market Street, Wilmington, Delaware 19899. Chemours FC is a subsidiary of The Chemours

Company.

930. Chemours FC designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

931. Defendant Chubb Fire, Ltd. ("Chubb") is a foreign private limited company, with offices at Littleton Road, Ashford, Middlesex, United Kingdom TW15 1TZ. Upon information and belief, Chubb is registered in the United Kingdom with a registered number of 134210. Upon information and belief, Chubb is or has been composed of different subsidiaries and/or divisions, including but not limited to, Chubb Fire & Security Ltd., Chubb Security, PLC, Red Hawk Fire & Security, LLC, and/or Chubb National Foam, Inc.

932. Chubb designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

933. Defendant Clariant Corporation ("Clariant") is a New York corporation and does business throughout the United States. Clariant has its principal place of business at 4000 Monroe Road, Charlotte, North Carolina 28205.

934. Clariant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF

containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

935. Defendant Corteva, Inc. ("Corteva") is a Delaware Corporation that conducts business throughout the United States. Its principal place of business is Chestnut Run Plaza 735, Wilmington, Delaware 19805. Corteva is the successor-in-interest to Dupont Chemical Solutions Enterprise.

936. Corteva designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

937. Defendant Deepwater Chemicals, Inc. ("Deepwater") is a Delaware corporation and does business throughout the United States. Deepwater's principal place of business is at 196122 E County Road 735, Woodward, Oklahoma 73801.

938. Deepwater designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which

contained PFAS for use in firefighting.

939. Defendant Du Pont de Nemours Inc. (f/k/a DowDuPont, Inc.) (“DowDuPont”), is a Delaware corporation and does business throughout the United States. DowDuPont, has its principal place of business at 1007 Market Street, Wilmington, Delaware 19899 and 2211 H.H. Dow Way, Midland, Michigan 48674. DowDupont was created in 2015 to transfer Chemours and DuPont liabilities for manufacturing and distributing fluorosurfactants to AFFF manufacturers.

940. DowDuPont designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

941. Defendant Dynax Corporation (“Dynax”) is a New York corporation that conducts business throughout the United States. Its principal place of business is 103 Fairview Park Drive, Elmsford, New York, 10523-1544.

942. Dynax designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

943. Defendant E. I. du Pont de Nemours and Company (“DuPont”), is a Delaware corporation and does business throughout the United States. DuPont has its principal place of business at 1007 Market Street, Wilmington, Delaware 19898.

944. DuPont designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

945. Defendant Kidde P.L.C., Inc. ("Kidde P.L.C.") is a foreign corporation organized and existing under the laws of the State of Delaware and does business throughout the United States. Kidde P.L.C. has its principal place of business at One Carrier Place, Farmington, Connecticut 06034. Upon information and belief, Kidde PLC was formerly known as Williams Holdings, Inc. and/or Williams US, Inc.

946. Kidde P.L.C. designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

947. Defendant Nation Ford Chemical Company ("Nation Ford") is a South Carolina company and does business throughout the United States. Nation Ford has its principal place of business at 2300 Banks Street, Fort Mill, South Carolina 29715.

948. Nation Ford designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials,

promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

949. Defendant National Foam, Inc. ("National Foam") is a Delaware corporation and does business throughout the United States. National Foam has its principal place of business at 141 Junny Road, Angier, North Carolina, 27501.

950. National Foam designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

951. Defendant Tyco Fire Products, LP, as successor-in-interest to The Ansul Company ("Tyco"), is a Delaware limited partnership and does business throughout the United States. Tyco has its principal place of business at 1400 Pennbrook Parkway, Lansdale, Pennsylvania 19466. Tyco manufactured and currently manufactures the Ansul brand of products, including Ansul brand AFFF containing PFAS.

952. Tyco is the successor in interest to the corporation formerly known as The Ansul Company ("Ansul"). At all times relevant, Tyco/Ansul designed, marketed, developed, manufactured, distributed released, trained users, produced instructional materials, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which

contained PFAS for use in firefighting.

953. Defendant United Technologies Corporation (“United Technologies”) is a foreign corporation organized and existing under the laws of the State of Delaware and does business throughout the United States. United Technologies has its principal place of business at 8 Farm Springs Road, Farmington, Connecticut 06032.

954. United Technologies designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

955. Defendant UTC Fire & Security Americas Corporation, Inc. (f/k/a GE Interlogix, Inc.) (“UTC”) is a North Carolina corporation and does business throughout the United States. UTC has principal place of business at 3211 Progress Drive, Lincolnton, North Carolina 28092. Upon information and belief, Kidde-Fenwal, Inc. is part of the UTC Climate Control & Security unit of United Technologies Corporation.

956. UTC designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, sold, and/or otherwise handled and/or used AFFF containing PFAS that are the subject of this Complaint. Further, defendant designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used underlying chemicals and/or products added to AFFF which contained PFAS for use in firefighting.

957. Defendant Allstar Fire Equipment is a California corporation (“Allstar”) and does business throughout the United States. Allstar has its principal place of business at 12328 Lower Azusa

Road, Arcadia, California 91006.

958. Allstar developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

959. Defendant Fire-Dex, LLC ("Fire-Dex") is a Delaware corporation and does business throughout the United States. Fire-Dex has its principal place of business at 780 South Progress Drive, Medina, Ohio 44256.

960. Fire-Dex developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

961. Defendant Globe Manufacturing Company LLC ("Globe") is a New Hampshire corporation and does business throughout the United States. Globe has its principal place of business at 37 Loudon Road, Pittsfield, New Hampshire 03263.

962. Globe developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

963. Defendant Honeywell Safety Products USA, Inc. ("Honeywell") is a Delaware corporation and does business throughout the United States. Honeywell has its principal place of business at 300 South Tryon Street Suite 500, Charlotte, North Carolina 28202.

964. Honeywell developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

965. Defendant Lion Group, Inc. ("Lion") is an Ohio corporation and does business throughout the United States. Lion has its principal place of business at 7200 Poe Avenue, Suite 400 Dayton, Ohio, 45414.

966. Lion developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

967. Defendant Mallory Safety and Supply LLC. ("Mallory") is a Washington corporation and

does business throughout the United States. Mallory has its principal place of business at 1040 Industrial Way, Longview, Washington, 98632.

968. Mallory developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

969. Defendant Mine Safety Appliances Co., Inc. ("MSA") is a Pennsylvania corporation and does business throughout the United States. MSA has its principal place of business at 1000 Cranberry Woods Drive, Cranberry Township, Pennsylvania, 16066.

970. MSA developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

971. Defendant Municipal Emergency Services, Inc. ("MES") is a Nevada corporation and does business throughout the United States. MES has its principal place of business at 12 Turnberry Lane, Sandy Hook, Connecticut 06482.

972. MES developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

973. Defendant PBI Performance Products, Inc. ("PBI") is a Delaware corporation and does business throughout the United States. PBI has its principal place of business at 9800-D Southern Pine Boulevard, Charlotte, North Carolina 28273.

974. PBI developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

975. Defendant Southern Mills, Inc. ("Southern Mills") is a Georgia corporation and does business throughout the United States. Southern Mills has its principal place of business at 6501 Mall Boulevard, Union City, Georgia 30291.

976. Southern Mills developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

977. Defendant Stedfast USA, Inc. (“Stedfast”) is a Delaware corporation and does business throughout the United States. Stedfast has its principal place of business at 800 Mountain View Drive, Piney Flats, Tennessee 37686.

978. Stedfast developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

979. Defendant W.L. Gore & Associates Inc. (“Gore”) is a Delaware corporation and does business throughout the United States. Gore has its principal place of business at 1901 Barksdale Road, Newark, Delaware 19711.

980. Gore developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

981. When reference is made in this Complaint to any act or omission of any of Defendants, it shall be deemed that the officers, directors, agents, employees, or representatives of Defendants committed or authorized such act or omission, or failed to adequately supervise or properly control or direct their employees while engaged in the management, direction, operation, or control of the affairs of Defendants, and did so while acting within the scope of their duties, employment or agency.

982. The term “AFFF Defendant” or “AFFF Defendants” refers to all Defendants named herein who designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold and/or otherwise handled and/or used AFFF containing PFAS that are used in firefighting training and response exercises which are the subject of this Complaint. jointly and severally, unless otherwise stated.

983. The term “TOG Defendant” or “TOG Defendants” refers to all Defendants names herein who developed, manufactured, marketed, distributed, released, sold, and/or used PFAS, PFAS materials, and products containing PFAS in turnout gear for use in firefighting.

FACTUAL ALLEGATIONS

984. Aqueous Film-Forming Foam ("AFFF") is a combination of chemicals used to extinguish hydrocarbon fuel-based fires.

985. AFFF-containing fluorinated surfactants have better firefighting capabilities than water due to their surfactant-tension lowering properties which allow the compound(s) to extinguish fire by smothering, ultimately starving it of oxygen.

986. AFFF is a Class-B firefighting foam. It is mixed with water and used to extinguish fires that are difficult to fight, particularly those that involve petroleum or other flammable liquids.

987. AFFF Defendants designed, marketed, developed, manufactured, distributed, released, trained users, produced instructional materials, promoted, sold, and/or otherwise handled AFFF containing toxic PFAS or underlying PFAS containing chemicals used in AFFF production that were used by entities around the country, including military, county, and municipal firefighting departments.

988. AFFF Defendants have each designed, marketed, developed, manufactured, distributed, released, trained users on, produced instructional materials for, sold, and/or otherwise handled and/or used AFFF containing PFAS, in such a way as to cause the contamination of Plaintiffs' blood and/or body with PFAS, and the resultant biopersistence and bioaccumulation of such PFAS in the blood and/or body of Plaintiffs.

989. AFFF was introduced commercially in the mid-1960s and rapidly became the primary firefighting foam in the United States and in other parts of the world. It contains PFAS, which are highly fluorinated synthetic chemical compounds whose family include PFOS and PFOA.

990. PFAS are a family of chemical compounds containing fluorine and carbon atoms.

991. PFAS have been used for decades in the manufacture of AFFF. The PFAS family of chemicals are entirely human-made and do not naturally occur or otherwise exist.

992. Prior to commercial development and large-scale manufacture and use of AFFF containing PFAS, no such PFAS had been found or detected in human blood.

A. AFFF / PFAS Hazardous Effects on Humans

993. AFFF and its components are associated with a wide variety of adverse health effects in humans.

994. Exposure to AFFF Defendants' products has been linked to serious medical conditions including, but not limited to, kidney cancer, testicular cancer, liver cancer, testicular tumors, pancreatic cancer, prostate cancer, leukemia, lymphoma, bladder cancer, thyroid disease and infertility.

995. By at least the end of the 1960s, animal toxicity testing performed by some Defendants manufacturing and/or using PFAS indicated that exposure to such materials, including at least PFOA, resulted in various adverse health effects among multiple species of laboratory animals, including toxic effects to the liver, testes, adrenals, and other organs and bodily systems.

996. By at least the end of the 1960s, additional research and testing performed by some Defendants manufacturing and/or using PFAS indicated that such materials, including at least PFOA, because of their unique chemical structure, were resistant to environmental degradation and would persist in the environment essentially unaltered if allowed to enter the environment.

997. By at least the end of the 1970s, additional research and testing performed by some Defendants manufacturing and/or using PFAS indicated that one or more such materials, including at least PFOA and PFOS, because of their unique chemical structure, would bind to proteins in the blood of animals and humans exposed to such materials where such materials would remain and persist over long periods of time and would accumulate in the blood/body of the exposed individuals with each additional exposure.

998. By at least the end of the 1980s, additional research and testing performed by some

Defendants manufacturing and/or using PFAS indicated that at least one such PFAS, PFOA, had caused Leydig cell (testicular) tumors in a chronic cancer study in rats, resulting in at least one such Defendant, DuPont, classifying such PFAS internally as a confirmed animal carcinogen and possible human carcinogen.

999. It was understood by AFFF Defendants by at least the end of the 1980s that a chemical that caused cancer in animal studies must be presumed to present a cancer risk to humans, unless the precise mechanism of action by which the tumors were caused was known and would not occur in humans.

1000. By at least the end of the 1980s, scientists had not determined the precise mechanism of action by which any PFAS caused tumors. Therefore, scientific principles of carcinogenesis classification mandated AFFF Defendants presume any such PFAS material that caused tumors in animal studies could present a potential cancer risk to exposed humans.

1001. By at least the end of the 1980s, additional research and testing performed by some Defendants manufacturing and/or using PFAS, including at least DuPont, indicated that elevated incidence of certain cancers and other adverse health effects, including elevated liver enzymes and birth defects, had been observed among workers exposed to such materials, including at least PFOA, but such data was not published, provided to governmental entities as required by law, or otherwise publicly disclosed at the time.

1002. By at least the end of the 1980s, some Defendants, including at least 3M and DuPont, understood that, not only did PFAS, including at least PFOA and PFOS, get into and persist and accumulate in the human blood and in the human body, but that once in the human body and blood, particularly the longer-chain PFAS, such as PFOS and PFOA, had a long half-life. Meaning that it would take a very long time before even half of the material would start to be eliminated, which allowed increasing levels of the chemicals to build up and accumulate in the blood and/or body of

exposed individuals over time, particularly if any level of exposure continued.

1003. By at least the end of the 1990s, additional research and testing performed by some Defendants manufacturing and/or using PFAS, including at least 3M and DuPont, indicated that at least one such PFAS, PFOA, had caused a triad of tumors (Leydig cell (testicular), liver, and pancreatic) in a second chronic cancer study in rats.

1004. By at least the end of the 1990s, the precise mechanism(s) of action by which any PFAS caused each of the tumors found in animal studies had still not been identified, mandating that AFFF Defendants continue to presume that any such PFAS that caused such tumors in animal studies could present a potential cancer risk to exposed humans.

1005. By at least 2010, additional research and testing performed by some Defendants manufacturing and/or using PFAS, including at least 3M and DuPont, revealed multiple potential adverse health impacts among workers exposed to such PFAS, including at least PFOA, such as increased cancer incidence, hormone changes, lipid changes, and thyroid and liver impacts.

1006. When the United States Environmental Protection Agency (“USEPA”) and other state and local public health agencies and officials first began learning of PFAS exposure in the United States and potential associated adverse health effects, AFFF Defendants repeatedly assured and represented to such entities and the public that such exposure presented no risk of harm and were of no significance.

1007. After the USEPA and other entities began asking Defendants to stop manufacturing and/or using certain PFAS, AFFF Defendants began manufacturing and/or using and/or began making and/or using more of certain other and/or “new” PFAS, including PFAS materials with six or fewer carbons, such as GenX (collectively “Short-Chain PFAS”).

1008. AFFF Defendants manufacturing and/or using Short-Chain PFAS, including at least DuPont and 3M, are aware that one or more such Short-Chain PFAS materials also have been

found in human blood.

1009. By at least the mid-2010s, AFFF Defendants, including at least DuPont and Chemours, were aware that at least one Short-Chain PFAS had been found to cause the same triad of tumors (Leydig (testicular), liver, and pancreatic) in a chronic rat cancer study as had been found in a chronic rat cancer study with a non-Short-Chain PFAS.

1010. Research and testing performed by and/or on behalf of AFFF Defendants making and/or using Short-Chain PFAS indicates that such Short-Chain PFAS materials present the same, similar, and/or additional risks to human health as had been found in research on other PFAS materials, including cancer risk.

1011. Nevertheless, AFFF Defendants repeatedly assured and represented to governmental entities and the public (and continue to do so) that the presence of PFAS, including Short-Chain PFAS, in human blood at the levels found within the United States present no risk of harm and is of no legal, toxicological, or medical significance of any kind.

1012. At all relevant times, AFFF Defendants, individually and/or collectively, possessed the resources and ability but have intentionally, purposefully, recklessly, and/or negligently chosen not to fund or sponsor any study, investigation, testing, and/or other research of any kind of the nature that AFFF Defendants claim is necessary to confirm and/or prove that the presence of any one and/or combination of PFAS in human blood causes any disease and/or adverse health impact of any kind in humans, presents any risk of harm to humans, and/or is of any legal, toxicological, or medical significance to humans, according to standards AFFF Defendants deem acceptable.

1013. Even after an independent science panel, known as the "C8 Science Panel," publicly announced in the 2010s that human exposure to 0.05 parts per billion or more of one PFAS, PFOA, had "probable links" with certain human diseases, including kidney cancer, testicular cancer, ulcerative colitis, thyroid disease, preeclampsia, and medically-diagnosed high cholesterol, AFFF

Defendants repeatedly assured and represented to governmental entities, their customers, and the public (and continue to do so) that the presence of PFAS in human blood at the levels found within the United States presents no risk of harm and is of no legal, toxicological, or medical significance of any kind, and have represented to and assured such governmental entities, their customers, and the public (and continue to do so) that the work of the independent C8 Science Panel was inadequate.

1014. At all relevant times, AFFF Defendants shared and/or should have shared among themselves all relevant information relating to the presence, biopersistence, and bioaccumulation of PFAS in human blood and associated toxicological, epidemiological, and/or other adverse effects and/or risks.

1015. As of the present date, blood serum testing and analysis by AFFF Defendants, independent scientific researchers, and/or government entities has confirmed that PFAS materials are clinically demonstrably present in approximately 99% of the current population of the United States.

1016. There is no naturally-occurring “background,” normal, and/or acceptable level or rate of any PFAS in human blood, as all PFAS detected and/or present in human blood is present and/or detectable in such blood as a direct and proximate result of the acts and/or omissions of Defendants.

1017. At all relevant times, Defendants, through their acts and/or omissions, controlled, minimized, trivialized, manipulated, and/or otherwise influenced the information that was published in peer-review journals, released by any governmental entity, and/or otherwise made available to the public relating to PFAS in human blood and any alleged adverse impacts and/or risks associated therewith, effectively preventing Plaintiffs from discovering the existence and extent of any injuries/harm as alleged herein.

1018. At all relevant times, Defendants, through their acts and/or omissions, took steps to attack, challenge, discredit, and/or otherwise undermine any scientific studies, findings, statements,

and/or other information that proposed, alleged, suggested, or even implied any potential adverse health effects or risks and/or any other fact of any legal, toxicological, or medical significance associated with the presence of PFAS in human blood.

1019. At all relevant times, Defendants, through their acts and/or omissions, concealed and/or withheld information from their customers, governmental entities, and the public that would have properly and fully alerted Plaintiffs to the legal, toxicological, medical, or other significance and/or risk from having any PFAS material in Plaintiffs' blood.

1020. At all relevant times, Defendants encouraged the continued and even further increased use of PFAS by their customers and others, including but not limited to the manufacture, use, and release, of AFFF containing PFAS and/or emergency responder protection gear or equipment coated with materials made with or containing PFAS, and tried to encourage and foster the increased and further use of PFAS in connection with as many products/uses/and applications as possible, despite knowledge of the toxicity, persistence, and bioaccumulation concerns associated with such activities.

1021. To this day, Defendants deny that the presence of any PFAS in human blood, at any level, is an injury or presents any harm or risk of harm of any kind, or is otherwise of any legal, toxicological, or medical significance.

1022. To this day, Defendants deny that any scientific study, research, testing, or other work of any kind has been performed that is sufficient to suggest to the public that the presence of any PFAS material in human blood, at any level, is of any legal, toxicological, medical, or other significance.

1023. Defendants, to this day, affirmatively assert and represent to governmental entities, their customers, and the public that there is no evidence that any of the PFAS found in human blood across the United States causes any health impacts or is sufficient to generate an increased

risk of future disease sufficient to warrant diagnostic medical testing, often referring to existing studies or data as including too few participants or too few cases or incidents of disease to draw any scientifically credible or statistically significant conclusions.

1024. Defendants were and/or should have been aware, knew and/or should have known, and/or foresaw or should have foreseen that their design, marketing, development, manufacture, distribution, release, training and response of users, production of instructional materials, sale and/or other handling and/or use of AFFF containing PFAS would result in the contamination of the blood and/or body of Plaintiffs with PFAS, and the biopersistence and bioaccumulation of such PFAS in their blood and/or body.

1025. Defendants were and /or should have been aware, or knew and/or should have known, and/or foresaw or should have foreseen that allowing PFAS to contaminate the blood and/or body of Plaintiffs would cause injury, irreparable harm, and/or unacceptable risk of such injury and/or irreparable harm to Plaintiffs.

1026. Defendants did not seek or obtain permission or consent from Plaintiffs before engaging in such acts and/or omissions that caused, allowed, and/or otherwise resulted in Plaintiffs' exposure to AFFF and the contamination of Plaintiffs' blood and/or body with PFAS materials, and resulting biopersistence and bioaccumulation of such PFAS in their blood and/or body.

B. Defendants' History of Manufacturing and Selling AFFF

1027. 3M began producing PFOS and PFOA by electrochemical fluorination in the 1940s. In the 1960s, 3M used its fluorination process to develop AFFF.

1028. 3M manufactured, marketed, and sold AFFF from the 1960s to the early 2000s.

1029. National Foam and Tyco/Ansul began to manufacture, market, and sell AFFF in the 1970s.

1030. Buckeye began to manufacture, market, and sell AFFF in the 2000s.

1031. In 2000, 3M announced it was phasing out its manufacture of PFOS, PFOA, and related

products, including AFFF. 3M, in its press release announcing the phase out, stated “our products are safe,” and that 3M’s decision was “based on [its] principles of responsible environment management.” 3M further stated that “the presence of these materials at [] very low levels does not pose a human health or environmental risk.” In communications with the EPA at that time, 3M also stated that it had “concluded that...other business opportunities were more deserving of the company’s energies and attention...”

1032. Following 3M’s exit from the AFFF market, the remaining AFFF Defendants continued to manufacture and sell AFFF that contained PFAS and/or its precursors.

1033. AFFF Defendants knew their customers warehoused large stockpiles of AFFF. In fact, AFFF Defendants marketed their AFFF products by touting its shelf-life. Even after AFFF Defendants fully understood the toxicity of PFAS, and their impacts to the health of humans following exposure, AFFF Defendants concealed the true nature of PFAS. While AFFF Defendants phased out production or transitioned to other formulas, they did not instruct their customers that they should not use AFFF that contained PFAS and/or their precursors. AFFF Defendants further did not act to get their harmful products off the market.

1034. AFFF Defendants did not warn public entities, firefighter trainees who they knew would foreseeably come into contact with their AFFF products, or firefighters employed by either civilian and/or military employers that use of and/or exposure to AFFF Defendants’ products containing PFAS and/or its precursors would pose a danger to human health

1035. Plaintiffs directly used, were exposed, and/or were given AFFF to help fight fires on a regular basis. Plaintiffs used and ingested water contaminated with AFFF.

1036. Plaintiffs were never informed that this product was inherently dangerous. Nor were Plaintiffs warned about the known health risks associated with this product.

1037. Plaintiffs never received or were told to use any protective gear to guard against the known

dangerous propensities of this product.

1038. AFFF Defendants have known of the health hazards associated with AFFF and/or its compounds for decades and that in their intended and/or common use would harm human health.

1039. Information regarding AFFF and its compounds were readily accessible to each of the above-referenced AFFF Defendants for decades because each is an expert in the field of AFFF manufacturing and/or the materials needed to manufacture AFFF, and each has detailed information and understanding about the chemical compounds that form AFFF products.

1040. AFFF Defendants' manufacture, distribution and/or sale of AFFF resulted in Plaintiffs and other individuals who came in contact with the chemical to develop cancer.

1041. AFFF Defendants through their manufacturing, distribution and/or sale of AFFF, and through their involvement and/or participation in the creation of training and instructional materials and activities, knew, foresaw, and/or should have known and/or foreseen that Plaintiffs and those similarly situated would be harmed.

1042. AFFF Defendants' products were unreasonably dangerous and Defendants failed to warn of this danger.

C. PFAS-Containing Turnout Gear

1043. During firefighting training and when responding to fires and performing fire extinguishment, firefighters wear turnouts that are intended to provide a degree of thermal, chemical, and biological protection for a firefighter. Turnout gear components include individual components such as a helmet, hood, jacket, pants and suspenders, boots, and gloves. Each component of the jacket and pants are made of an outer layer, as well as several inner layers that include a moisture barrier and thermal liner which are meant to protect the firefighter from ambient heat.

1044. PFAS chemicals are used in turnout gear to impart heat, water, and stain resistance to the outer shell and moisture barrier of turnout gear.

1045. A June 2020 study of turnout gear by researchers at the University of Notre Dame analyzed 30 new and used turnout jackets and pants originally marketed, distributed and sold in 2008, 2014, and 2017, by six turnout gear makers, including Defendants MSA, Globe, Lion and Honeywell and found high levels of PFAS in turnout gear worn, used, or handled by firefighters, including the Firefighter Plaintiffs.

1046. When exposed to heat, PFAS chemicals in the turnouts off-gas, break down, and degrade into highly mobile and toxic particles and dust, exposing firefighters to PFAS chemicals, particles and dust, including through skin contact/absorption, ingestion (e.g., hand-to-mouth contact) and/or inhalation. Further firefighter exposure to these highly mobile and toxic materials occurs through normal workplace activities, because particles or dust from their turnouts spread to fire vehicles and fire stations, as well as firefighters' personal vehicles and homes.

1047. Such workplace exposure to PFAS or PFAS-containing materials has been found to be toxic to humans. As far back as a July 31, 1980 internal memo, DuPont officials described measures that were needed to prevent workplace exposure to PFOA, which they knew could permeate all protective materials, and noted that PFOA's toxicity varied depending on the exposure pathway, acknowledging that ingestion was "slightly toxic," dermal contact was "slightly to moderately toxic" and inhalation was "highly toxic." The memo concluded "continued exposure is not tolerable."

1048. As alleged herein, the Firefighter Plaintiffs wear and/or wore turnouts in the ordinary course of performing their duties, as the turnouts were intended to be used and in a foreseeable manner, which exposed them to significant levels of PFAS.

1049. The Firefighter Plaintiffs did not know, and in the exercise of reasonable diligence could not have known, that the turnouts they wore or used in the course of performing their duties contained PFAS or PFAS-containing materials, and similarly did not know and could not have known that they routinely suffered exposure to PFAS or PFAS-containing materials in the turnouts they wore or used in performing their duties. The turnout gear worn or used by the Firefighter Plaintiffs did not and does not contain labeling information saying that the gear contains PFAS,

and similarly did not and does not warn the Firefighter Plaintiffs of the health risks associated with exposure to PFAS.

1050. Like fire departments across the country, many Plaintiffs only had one set of turnouts for years, and would wash their turnouts at home and/or in station machines along with their daily station wear uniforms.

CAUSES OF ACTION

COUNT I **NEGLIGENCE**

1051. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

1052. Defendants had a duty to individuals, including Plaintiffs, to exercise reasonable ordinary, and appropriate care in the manufacturing, design, labeling, packaging, testing, instruction, warning, selling, marketing, distribution, and training related to the AFFF or TOG product.

1053. Defendants breached their duty of care and were negligent, grossly negligent, reckless and willful as described herein in the design, manufacture, labeling, warning, instruction, training, selling, marketing, and distribution of the AFFF or TOG products or underlying PFAS containing chemicals used in AFFF or TOG production in one or more of the following respects:

- a. Failing to design the products so as to avoid an unreasonable risk of harm to individuals, including Plaintiffs;
- b. Failing to use reasonable care in the testing of the products so as to avoid an unreasonable risk of harm to individuals, including Plaintiffs;
- c. Failing to use appropriate care in inspecting the products so as to avoid an unreasonable risk of harm to individuals, including Plaintiffs;
- d. Failing to use appropriate care in instructing and/or warning the public as set forth herein of risks associated with the products, so as to avoid unreasonable risk of harm to individuals, including Plaintiffs;
- e. Failing to use reasonable care in marketing, promoting, and advertising the products so as

to avoid unreasonable risk of harm to individuals, including Plaintiffs;

f. Otherwise negligently or carelessly designing, manufacturing, marketing, distributing, warning; and

g. In selling and or distributing a product which was inherently dangerous to the public;

1054. As a direct and proximate result of Defendants' negligence, Plaintiffs have been injured, sustained severe and permanent pain, suffering, disability, impairment, loss of enjoyment of life, loss of care, comfort, economic loss and damages including, but not limited to medical expenses, lost income, and/or other damages.

WHEREFORE, Plaintiffs pray judgments against Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

COUNT II
BATTERY

1055. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

1056. At all relevant times, Defendants possessed knowledge that the AFFF or TOG containing PFAS which they designed, engineered, manufactured, fabricated, sold, handled, released, trained users on, produced instructional materials for, used, and/or distributed were bio- persistent, bio- accumulative, toxic, potentially carcinogenic, and/or otherwise harmful/injurious and that their continued manufacture, use, sale, handling, release, and distribution would result in Plaintiffs having PFAS in Plaintiffs' blood, and the biopersistence and bioaccumulation of such PFAS in Plaintiffs' blood.

1057. However, despite possessing such knowledge, Defendants knowingly, purposefully, and/or intentionally continued to engage in such acts and/or omissions, including but not limited to all such acts and/or omissions described in this Complaint, that continued to result in Plaintiffs

accumulating PFAS in Plaintiffs' blood and/or body, and such PFAS persisting and accumulating in Plaintiffs' blood and/or body.

1058. Defendants did not seek or obtain permission or consent from Plaintiffs to put or allow PFAS materials into Plaintiffs' blood and/or body, or to persist in and/or accumulate in Plaintiffs' blood and/or body.

1059. Entry into, persistence in, and accumulation of such PFAS in Plaintiffs' body and/or blood without permission or consent is an unlawful and harmful and/or offensive physical invasion and/or contact with Plaintiffs' person and unreasonably interferes with Plaintiffs' rightful use and possession of Plaintiffs' blood and/or body.

1060. At all relevant times, the PFAS present in the blood of Plaintiffs originated from Defendants' acts and/or omissions.

1061. Defendants continue to knowingly, intentionally, and/or purposefully engage in acts and/or omissions that result in the unlawful and unconsented-to physical invasion and/or contact with Plaintiffs that resulted in persisting and accumulating levels of PFAS in Plaintiffs' blood.

1062. Plaintiffs, and any reasonable person, would find the contact at issue harmful and/or offensive.

1063. Defendants acted intentionally with the knowledge and/or belief that the contact, presence and/or invasion of PFAS with, onto and/or into Plaintiffs' blood serum, including its persistence and accumulation in such serum, was substantially certain to result from those very acts and/or omissions.

1064. Defendants' intentional acts and/or omissions resulted directly and/or indirectly in harmful contact with Plaintiffs' blood and/or body.

1065. The continued presence, persistence, and accumulation of PFAS in the blood and/or body of Plaintiffs is offensive, unreasonable, and/or harmful, and thereby constitutes a battery.

1066. The presence of PFAS in the blood and/or body of Plaintiffs altered the structure and/or function of such blood and/or body parts and resulted in cancer.

1067. As a direct and proximate result of the foregoing acts and omissions, Plaintiffs suffered physical injury for which Defendants are therefore liable.

WHEREFORE, Plaintiffs pray judgments against Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

COUNT III
FAILURE TO WARN

1068. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

1069. The aforementioned products were sold, distributed, or otherwise put into the stream of commerce, designed or manufactured by defendants. Plaintiffs allege that this defendant violated the New Jersey Product Liability Act N.J.S. 2A:58C-2 et seq. in that the products were not reasonably safe products and/or were not products that were reasonably fit, suitable and safe for its intended uses because they were designed defectively, manufactured defectively, and/or there were not adequate warnings provided by the manufacturer.

1070. Defendants knew or should have known:

- a) exposure to AFFF or TOG containing PFAS was hazardous to human health;
- b) the manner in which they were designing, marketing, developing, manufacturing, distributing, releasing, training, instructing, promoting, and selling AFFF or TOG containing PFAS was hazardous to human health; and
- c) the manner in which they were designing, marketing, developing, manufacturing, marketing, distributing, releasing, training, instructing, promotion and selling AFFF or TOG containing PFAS would result in the contamination of Plaintiffs' blood and/or body as a result of exposure.

1071. Defendants had a duty to warn of the hazards associated with AFFF or TOG containing PFAS entering the blood and/or body of Plaintiffs because they knew of the dangerous, hazardous, and toxic properties of AFFF or TOG containing PFAS. Defendants failed to provide sufficient warning to purchasers that the use of their AFFF or TOG products would cause PFAS to be released and cause the exposure and bioaccumulation of these toxic chemicals in the blood and/or body of Plaintiffs.

1072. Adequate instructions and warnings on the AFFF or TOG containing PFAS could have reduced or avoided these foreseeable risks of harm and injury to Plaintiffs. If Defendants provided adequate warnings:

- a) Plaintiffs could have and would have taken measures to avoid or lessen exposure; and
- b) end users and governments could have taken steps to reduce or prevent the release of PFASs into the blood and/or body of Plaintiffs. Defendants' failure to warn was a direct and proximate cause of Plaintiffs' injuries from PFAS that came from the use, storage, and disposal of AFFF or TOG containing PFAS. Crucially, Defendants' failure to provide adequate and sufficient warnings for the AFFF or TOG containing PFAS they designed, marketed, manufactured, distributed, released, promoted, and sold renders the AFFF or TOG a defective product.

1073. Defendants were negligent in their failure to provide Plaintiffs with adequate warnings or instruction that the use of their AFFF or TOG products would cause PFAS to be released into the blood and/or body of Plaintiffs. As a result of Defendants' conduct and the resulting contamination, Plaintiffs suffered severe personal injuries by exposure to AFFF or TOG containing PFAS.

1074. Defendants' negligent failure to warn directly and proximately caused the harm to and damages suffered by Plaintiffs.

WHEREFORE, Plaintiffs pray judgments against Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

COUNT IV
DEFECTIVE DESIGN

1075. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

1076. The aforementioned products were, sold, distributed, or otherwise put into the stream of commerce, designed or manufactured by defendants. Plaintiffs allege that this defendant violated the New Jersey Product Liability Act N.J.S. 2A:58C-2 et seq. in that the products were not reasonably safe products and/or were not products that were reasonably fit, suitable and safe for its intended uses because they were designed defectively, manufactured defectively, and/or there were not adequate warnings provided by the manufacturer.

1077. Defendants knew or should have known:

- a) exposure to AFFF or TOG containing PFAS is hazardous to human health;
- b) the manner in which AFFF or TOG containing PFAS was designed, manufactured, marketed, distributed, and sold was hazardous to human health; and
- c) the manner in which AFFF or TOG containing PFAS was designed, manufactured, marketed, distributed, and could and would release PFAS into Plaintiffs and cause the exposure and bioaccumulation of these toxic and poisonous chemicals in the blood and/or body of Plaintiffs.

1078. Knowing of the dangerous and hazardous properties of the AFFF or TOG containing PFAS, Defendants could have designed, manufactured, marketed, distributed, and sold alternative designs or formulations of AFFF or TOG that did not contain hazardous and toxic PFAS. These alternative designs and formulations were already available, practical, and technologically feasible. The use of these alternative designs would have reduced or prevented reasonably foreseeable harm to Plaintiff caused by Defendants' design, manufacture, marketing, distribution, and sale of AFFF or TOG containing hazardous and toxic PFAS.

1079. The AFFF or TOG containing PFAS that was designed, manufactured, marketed,

distributed, and sold by Defendants was so hazardous, toxic, and dangerous to human health that the act of designing, formulating, manufacturing, marketing, distributing, and selling this AFFF was unreasonably dangerous under the circumstances.

1080. The AFFF or TOG designed, formulated, manufactured, marketed, distributed, and sold by Defendants was defectively designed and the foreseeable risk of harm could and would have been reduced or eliminated by the adoption of a reasonable alternative design that was not unreasonably dangerous. Defendants' defective design and formulation of AFFF or TOG containing PFAS was a direct and proximate cause of the contamination of the blood and/or body of Plaintiffs and the persistence and accumulation of PFAS in Plaintiffs' blood and/or body.

1081. Defendants' defective design and formulation of AFFF or TOG containing PFAS caused the contamination described herein resulting in personal injuries to Plaintiffs. As a direct result of the harm and injury caused by Defendants' defective design and the contamination described herein, Plaintiffs have been exposed to AFFF or TOG containing PFAS and other toxic substances and has developed cancer.

1082. Defendants' negligent failure to design a reasonably safe product directly and proximately caused the harm to and damages suffered by Plaintiffs.

WHEREFORE, Plaintiffs pray judgments against Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

COUNT V
STRICT LIABILITY (STATUTORY)

1083. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

1084. The aforementioned products were, sold, distributed, or otherwise put into the stream of

commerce, designed or manufactured by defendants. Plaintiffs allege that this defendant violated the New Jersey Product Liability Act N.J.S. 2A:58C-2 et seq. in that the products were not reasonably safe products and/or were not products that were reasonably fit , suitable and safe for its intended uses because they were designed defectively, manufactured defectively, and/or there were not adequate warnings provided by the manufacturer.

1085. Plaintiffs assert any and all remedies available under statutory causes of action from Plaintiffs' states for strict liability against each Defendant.

1086. Defendants were engaged in designing, manufacturing, marketing, selling, and distribution of AFFF or TOG.

1087. The AFFF or TOG was in a defective condition and unreasonably dangerous to users and/or consumers when designed, manufactured, marketed, sold, and/or distributed to the public by Defendants.

1088. As a direct and proximate result of Defendants products' aforementioned defects, Plaintiffs have been injured, sustained severe and permanent pain, suffering, disability, impairment, loss of enjoyment of life, loss of care, comfort, economic loss and damages including, but not limited to medical expenses, lost income, and other damages.

1089. Defendants are strictly liable in tort to Plaintiffs for their wrongful conduct.

WHEREFORE, Plaintiffs pray judgments against Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

COUNT VI
STRICT LIABILITY (RESTATEMENT)

1090. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

1091. The aforementioned products were, sold, distributed, or otherwise put into the stream of commerce, designed or manufactured by defendants. Plaintiffs allege that this defendant violated the New Jersey Product Liability Act N.J.S. 2A:58C-2 et seq. in that the products were not reasonably safe products and/or were not products that were reasonably fit, suitable and safe for its intended uses because they were designed defectively, manufactured defectively, and/or there were not adequate warnings provided by the manufacturer.

1092. Plaintiffs bring strict product liability claims under the common law, Section 402A of the Restatement of Torts (Second), and/or Restatement of Torts (Third) against Defendants.

1093. As designed, manufactured, marketed, tested, assembled, equipped, distributed and/or sold by Defendants the AFFF or TOG product was in a defective and unreasonably dangerous condition when put to reasonably anticipated use to foreseeable consumers and users, including Plaintiffs.

1094. Defendants had available reasonable alternative designs which would have made the AFFF or TOG product safer and would have most likely prevented the injuries and damages to Plaintiffs, thus violating state law and the Restatement of Torts.

1095. Defendants failed to properly and adequately warn and instruct Plaintiffs as to the proper safety and use of Defendants product.

1096. Defendants failed to properly and adequately warn and instruct Plaintiffs regarding the inadequate research and testing of the product.

1097. Defendants' products are inherently dangerous and defective, unfit and unsafe for their intended and reasonably foreseeable uses, and do not meet or perform to the expectations.

1098. As a proximate result of Defendants' design, manufacture, marketing, sale, and distribution of the products, Plaintiffs have been injured and sustained severe and permanent pain, suffering, disability, impairment, loss of enjoyment of life, loss of care, comfort, and consortium, and economic damages.

1099. By reason of the foregoing, Defendants are strictly liable for the injuries and damages suffered by Plaintiffs, caused by these defects in the AFFF or TOG product.

WHEREFORE, Plaintiffs pray judgments against Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

COUNT VII
FRAUDULENT CONCEALMENT

1100. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

1101. Throughout the relevant time period, Defendants knew that their products were defective and unreasonably unsafe for their intended purpose.

1102. Defendants fraudulently concealed from and/or failed to disclose to or warn Plaintiffs, and the public that their products were defective, unsafe, and unfit for the purposes intended, and that they were not of merchantable quality.

1103. Defendants were under a duty to Plaintiffs and the public to disclose and warn of the defective and harmful nature of the products because:

- a) Defendants were in a superior position to know the true quality, safety and efficacy of Defendants' products;
- b) Defendants knowingly made false claims about the safety and quality of Defendants' product in documents and marketing materials; and
- c) Defendants fraudulently and affirmatively concealed the defective nature of Defendants' products from Plaintiffs.

1104. The facts concealed and/or not disclosed by Defendants to Plaintiffs were material facts that a reasonable person would have considered to be important in deciding whether or not to purchase and/or use Defendants' products.

1105. Defendants intentionally concealed and/or failed to disclose the true defective nature of the

products so that Plaintiffs would use Defendants' products, Plaintiffs justifiably acted or relied upon, to Plaintiffs' detriment, the concealed and/or non-disclosed facts as evidenced by Plaintiffs' use of Defendants' products.

1106. Defendants, by concealment or other action, intentionally prevented Plaintiffs from acquiring material information regarding the lack of safety and effectiveness of Defendants' products and are subject to the same liability to Plaintiffs for Plaintiffs' pecuniary losses, as though Defendants had stated the non-existence of such material information regarding Defendants' products' lack of safety and effectiveness and dangers and defects, and as though Defendants had affirmatively stated the non-existence of such matters that Plaintiffs were thus prevented from discovering the truth. Defendants therefore have liability for fraudulent concealment under all applicable laws, including, inter alia, Restatement (Second) of Torts §550 (1977).

1107. As a proximate result of Defendants' conduct, Plaintiffs have been injured, and sustained severe and permanent pain, suffering, disability, impairment, loss of enjoyment of life, loss of care, comfort, and economic damages.

WHEREFORE, Plaintiffs pray judgments against Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

COUNT VIII
BREACH OF EXPRESS AND IMPLIED WARRANTIES

1108. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

1109. At all times relevant hereto, Defendants manufactured, marketed, labeled, and sold the AFFF or TOG products that has been previously alleged and described herein.

1110. At the time Defendants designed, developed, marketed, sold, labeled, and distributed the

AFFF or TOG products, Defendants knew of the use for which it was intended, and implied and/or expressly warranted that the product was merchantable, safe, and fit for its intended purpose.

1111. Defendants warranted that the product was merchantable and fit for the particular purpose for which it was intended and would be reasonably safe. These warranties were breached, and such breach proximately resulted in the injuries and damages suffered by Plaintiffs.

1112. Plaintiffs are within the class of foreseeable users and reasonably relied upon Defendants' judgment, and the implied and/or express warranties in using the products.

1113. Defendants breached their implied and/or express warranties and did not meet the ex merchantable quality nor safe for its intended use in that the product has a propensity to cause serious injury, pain, and cancer.

WHEREFORE, Plaintiffs pray judgments against Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

COUNT IX
WANTONNESS

1114. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

1115. Defendants and their employees, agents, officers, and representatives owed a duty of care to end users of their AFFF or TOG products, including Plaintiffs.

1116. Defendants breached the duty of care owed to Plaintiffs.

1117. The actions of Defendants and their employees, agents, officers, and representatives were willful and wanton and exhibited a reckless disregard for the life, health, and safety of the end users of Defendants' AFFF or TOG products, including Plaintiffs.

1118. As a proximate and foreseeable consequent of the actions of Defendants, Plaintiffs were

exposed to unreasonably dangerous toxic PFAS containing AFFF or TOG, which caused Plaintiffs' injury.

WHEREFORE, Plaintiffs pray judgments against Defendants for actual, compensatory, consequential, and punitive damages, together with the costs of this action, and for such other and further relief as this Court may deem fit, just, and proper.

COUNT X
PUNITIVE DAMAGES

1119. Plaintiffs hereby incorporate by reference the allegations contained in the preceding paragraphs of this Complaint as if restated in full herein.

1120. Upon information and belief, Defendants engaged in willful, wanton, malicious, and or/reckless conduct that was done without regard to the consequences or the safety of Plaintiffs and caused the foregoing injuries upon Plaintiffs, disregarding their protected rights.

1121. Defendants' willful, wanton, malicious, and/or reckless conduct includes but is not limited to Defendants' failure to take all reasonable measures to ensure Plaintiffs were not exposed to PFAS which Defendants knew were linked to serious medical conditions.

1122. Defendants have caused significant harm to Plaintiffs and have demonstrated a conscious and outrageous disregard for their safety with implied malice, warranting the imposition of punitive damages.

TOLLING OF THE STATUTE OF LIMITATIONS

Discovery Rule Tolling

1123. Plaintiffs had no way of knowing about the risk of serious injury associated with the use of and exposure to PFAS until very recently.

1124. Within the time period of any applicable statute of limitations, Plaintiffs could not have discovered, through the exercise of reasonable diligence, that exposure to PFAS is harmful to

human health.

1125. Plaintiffs did not discover and did not know of facts that would cause a reasonable person to suspect the risk associated with the use of and exposure to PFAS; nor would a reasonable and diligent investigation by Plaintiffs have disclosed that PFAS could cause personal injury.

1126. For these reasons, all applicable statutes of limitations have been tolled by operation of the discovery rule with respect to Plaintiffs' claims.

Fraudulent Concealment Tolling

1127. All applicable statute of limitations have also been tolled by Defendants knowing and active fraudulent concealment and denial of the facts alleged herein throughout the time period relevant to this action.

1128. Instead of disclosing critical safety information regarding AFFF or TOG, Defendants have consistently and falsely represented the safety of AFFF or TOG products.

1129. This fraudulent concealment continues through present day.

1130. Due to this fraudulent concealment, all applicable statutes of limitations have been tolled by operation of the discovery rule with respect to Plaintiffs' claims.

Estoppel

1131. Defendants were under a continuous duty to consumer, end users, and other persons coming into contact with their products, including Plaintiffs, to accurately provide safety information concerning its products and the risk associated with the use of and exposure to AFFF or TOG.

1132. Instead, Defendants knowingly, affirmatively, and actively concealed safety information concerning AFFF or TOG and the serious risks associated with the use of and exposure to AFFF or TOG.

1133. Based on the foregoing, Defendants are estopped from relying on any statute of limitations in defense of this action.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment and an award of damages against Defendants,
as follows:

- a) special damages, to include past and future medical and incidental expenses, according to proof;
- b) past and future loss of earnings and/or earning capacity, according to proof;
- c) past and future general damages, to include pain and suffering, emotional distress and mental anguish, according to proof;
- d) pre-judgment and post-judgment interest;
- e) the costs of this action; and
- f) treble and/or punitive damages to Plaintiffs; and
- g) granting any and all such other and further legal and equitable relief as the Court deems necessary, just and proper.

BAGOLIE-FRIEDMAN, LLC

Attorneys for Plaintiffs

Dated:

By:


ALAN T. FRIEDMAN

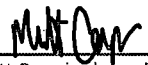
STAG LIUZZA, LLC

Attorneys for Plaintiffs

(Merritt Cunningham to be Admitted Pro Hac Vice)

Dated:

By:


Merritt Cunningham, Esq. (Jun 17, 2024 10:28 CDT)
MERRITT CUNNINGHAM


STAG LIUZZA, LLC

Attorneys for Plaintiffs

(Michael G. Stag to be Admitted Pro Hac Vice)

Dated:

By:


Michael G. Stag, Esq. (Jun 17, 2024 12:52 CDT)
MICHAEL G. STAG

JURY DEMAND

Plaintiffs hereby demand a trial by jury.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Alan T. Friedman is hereby designated as trial counsel in this matter.

CERTIFICATION PURSUANT TO R. 1:7-1(b)

PLEASE TAKE NOTICE that Plaintiffs intend to utilize the Time Unit Rule at closing.

CERTIFICATION PURSUANT TO R. 1:38-7(C)

I certify that confidential personal identifiers have been redacted from documents now submitted to the Court and will be redacted from all documents in the future in accordance with Rule 1:38-7(b).

DISCOVERY FOR DEMAND OF INSURANCE COVERAGE

The undersigned attorney for Plaintiffs hereby demand that proof of all insurance which may extend coverage to defendants for the subject incident and the limits of said coverage be furnished to plaintiffs within five (5) days of the date hereof.

DEMAND FOR ANSWERS TO FORM C AND FORM C(4) INTERROGATORIES

PLEASE TAKE NOTICE pursuant to R. 4:17-1(b), plaintiffs demand certified answers to Form C and C(4) Uniform Interrogatories set forth in Appendix to the Rules governing Civil Practice.

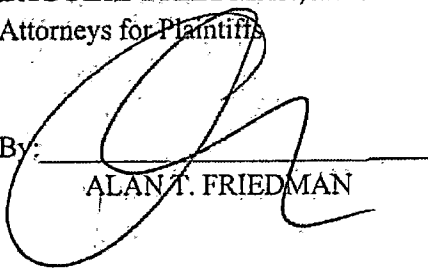
CERTIFICATION

Plaintiffs certify that the foregoing action is not the subject of any other action pending in any other court or arbitration proceeding and that no other action or arbitration proceeding is contemplated at this time. Plaintiffs further certify that no other persons are known to them who

should be joined as parties at this time. Plaintiffs are aware that if the statements contained within this certification are knowingly false, that they may be subject to punishment.

BAGOLIE-FRIEDMAN, LLC
Attorneys for Plaintiffs

Dated:

By: 
ALAN T. FRIEDMAN


STAG LIUZZA, LLC
Attorneys for Plaintiffs
(Merritt Cunningham to be Admitted Pro Hac Vice)

Dated:

By: 
Merritt Cunningham Esq. (Jun 17, 2024 10:28 CDT)
MERRITT CUNNINGHAM

STAG LIUZZA, LLC
Attorneys for Plaintiffs
(Michael G. Stag to be Admitted Pro Hac Vice)

Dated:

By: 
Michael G. Stag Esq. (Jun 17, 2024 12:52 CDT)
MICHAEL G. STAG

Civil Case Information Statement

Case Details: MORRIS | Civil Part Docket# L-001206-24

Case Type: PRODUCT LIABILITY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 12 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: George Perez? NO

Are sexual abuse claims alleged by: Henry Achey? NO

Are sexual abuse claims alleged by: Bryan Adamson? NO

Are sexual abuse claims alleged by: Nick Aguilera? NO

Are sexual abuse claims alleged by: Marty Alexander? NO

Are sexual abuse claims alleged by: Luis Alvarez? NO

Are sexual abuse claims alleged by: Gilbert Anderson? NO

Are sexual abuse claims alleged by: John Anderson? NO

Are sexual abuse claims alleged by: Orscen Anderson? NO

Are sexual abuse claims alleged by: Pierre Andre? NO

Are sexual abuse claims alleged by: Roderick Perez? NO

Are sexual abuse claims alleged by: Megan Archilla? NO

Are sexual abuse claims alleged by: Allen Arneson? NO

Are sexual abuse claims alleged by: John Armstrong? NO

Are sexual abuse claims alleged by: Bill Arnold? NO

Are sexual abuse claims alleged by: Brian Arps? NO

Are sexual abuse claims alleged by: Wesley Ashe? NO

Are sexual abuse claims alleged by: Shannon Ashley? NO

Are sexual abuse claims alleged by: Vonnie Autry? NO

Are sexual abuse claims alleged by: Cory Ayres? NO

Are sexual abuse claims alleged by: Willicha Baab? NO

Are sexual abuse claims alleged by: Earl Baird? NO

Are sexual abuse claims alleged by: Kenneth Barger? NO

Are sexual abuse claims alleged by: Miles Barnes? NO

Are sexual abuse claims alleged by: Randall Bass? NO

Are sexual abuse claims alleged by: Audrey Battles? NO

Are sexual abuse claims alleged by: Brian Baumgartner? NO

Are sexual abuse claims alleged by: Heather Beer? NO

Are sexual abuse claims alleged by: Terrell Belger? NO

Are sexual abuse claims alleged by: Thomas Bench? NO

Are sexual abuse claims alleged by: Gustavo Bendeck? NO

Are sexual abuse claims alleged by: Tracie Benison? NO

Are sexual abuse claims alleged by: John Bennett? NO

Are sexual abuse claims alleged by: Bruce Bergdahl? NO

Are sexual abuse claims alleged by: James Berger? NO

Are sexual abuse claims alleged by: Edwin Bermudez? NO

Are sexual abuse claims alleged by: John Betterley? NO

Are sexual abuse claims alleged by: David Bilbrey? NO

Are sexual abuse claims alleged by: Brian Billiet? NO

Are sexual abuse claims alleged by: George Birman? NO

Are sexual abuse claims alleged by: Christoph Blackledge? NO

Are sexual abuse claims alleged by: Grover Blackmon? NO

Are sexual abuse claims alleged by: Clye Blades? NO

Are sexual abuse claims alleged by: Michael Blankenship? NO

Are sexual abuse claims alleged by: David Bloodsworth? NO

Are sexual abuse claims alleged by: Mark Blurton? NO

Are sexual abuse claims alleged by: Kim Bodeker? NO

Are sexual abuse claims alleged by: Michael Bohnsdah? NO

Are sexual abuse claims alleged by: Joseph Boles? NO

Are sexual abuse claims alleged by: Christina Bonner? NO

Are sexual abuse claims alleged by: Branden Borden? NO

Are sexual abuse claims alleged by: David Boucher? NO

Are sexual abuse claims alleged by: Dennis Brady? NO

Are sexual abuse claims alleged by: Kevin Brady? NO

Are sexual abuse claims alleged by: Michael Branson? NO

Are sexual abuse claims alleged by: Robert Brazil? NO

Are sexual abuse claims alleged by: Justin Brehm? NO

Are sexual abuse claims alleged by: Billy Bridges? NO

Are sexual abuse claims alleged by: James Brooks? NO

Are sexual abuse claims alleged by: Darin Brown? NO

Are sexual abuse claims alleged by: Jeffrey Brown? NO

Are sexual abuse claims alleged by: Karl Brown? NO

Are sexual abuse claims alleged by: Jimmy Brown? NO

Are sexual abuse claims alleged by: Jeffrey Buckler? NO

Are sexual abuse claims alleged by: Richard Bullard? NO

Are sexual abuse claims alleged by: Terry Burdette? NO

Are sexual abuse claims alleged by: Stanley Burrell? NO

Are sexual abuse claims alleged by: Donald Burton? NO

Are sexual abuse claims alleged by: Wayne Bush? NO

Are sexual abuse claims alleged by: Phillip Bussinger? NO

Are sexual abuse claims alleged by: Salvatore Calabrese? NO

Are sexual abuse claims alleged by: Gregory Camden? NO

Are sexual abuse claims alleged by: Jose Cantu? NO

Are sexual abuse claims alleged by: Robert Cardona? NO

Are sexual abuse claims alleged by: Terry Carefoot? NO

Are sexual abuse claims alleged by: Christoph Carlson? NO

Are sexual abuse claims alleged by: Richard Carman? NO

Are sexual abuse claims alleged by: Jesse Carmen? NO

Are sexual abuse claims alleged by: David Carmon? NO

Are sexual abuse claims alleged by: Joel Carse? NO

Are sexual abuse claims alleged by: David Carson? NO

Are sexual abuse claims alleged by: William Cartagena? NO

Are sexual abuse claims alleged by: Craig Carter? NO

Are sexual abuse claims alleged by: Gregory Catlett? NO

Are sexual abuse claims alleged by: King Chancellor? NO

Are sexual abuse claims alleged by: Donald Chavez? NO

Are sexual abuse claims alleged by: James Chavez? NO

Are sexual abuse claims alleged by: Chet Cheatham? NO

Are sexual abuse claims alleged by: Gregory Childers? NO

Are sexual abuse claims alleged by: John Churchward? NO

Are sexual abuse claims alleged by: Samuel Cierzo? NO

Are sexual abuse claims alleged by: Lizabeth Clark? NO

Are sexual abuse claims alleged by: Tommy Clark? NO

Are sexual abuse claims alleged by: Winston Clay? NO

Are sexual abuse claims alleged by: Patti Clayton? NO

Are sexual abuse claims alleged by: Alonzo Cliatt? NO

Are sexual abuse claims alleged by: Gary Cochran? NO

Are sexual abuse claims alleged by: Thomas Cole? NO

Are sexual abuse claims alleged by: Anthony Collaso? NO

Are sexual abuse claims alleged by: Michael Combs? NO

Are sexual abuse claims alleged by: Michael Conner? NO

Are sexual abuse claims alleged by: Stephen Cook? NO

Are sexual abuse claims alleged by: David Coventry? NO

Are sexual abuse claims alleged by: George Cox? NO

Are sexual abuse claims alleged by: Patrick Cox? NO

Are sexual abuse claims alleged by: Stanton Crider? NO

Are sexual abuse claims alleged by: Alvin Cummins? NO

Are sexual abuse claims alleged by: Brock Cunningham? NO

Are sexual abuse claims alleged by: JC E Cunningham? NO

Are sexual abuse claims alleged by: Oliver Dangelo? NO

Are sexual abuse claims alleged by: Michael Dannenberg? NO

Are sexual abuse claims alleged by: Frank Darby? NO

Are sexual abuse claims alleged by: Joseph Davis? NO

Are sexual abuse claims alleged by: Larry Davis? NO

Are sexual abuse claims alleged by: Alexander De Leon? NO

Are sexual abuse claims alleged by: Armando Delatorre? NO

Are sexual abuse claims alleged by: Gabriel Demaio? NO

Are sexual abuse claims alleged by: Donald Derossett? NO

Are sexual abuse claims alleged by: Franklin Dhom? NO

Are sexual abuse claims alleged by: Richard Dice? NO

Are sexual abuse claims alleged by: Shari Dickinson? NO

Are sexual abuse claims alleged by: Richard Din? NO

Are sexual abuse claims alleged by: Christoph Dixon? NO

Are sexual abuse claims alleged by: Thomas Doherty? NO

Are sexual abuse claims alleged by: Joseph Dooley? NO

Are sexual abuse claims alleged by: Raymond Down? NO

Are sexual abuse claims alleged by: Ollie Dunlap? NO

Are sexual abuse claims alleged by: Dennis Durham? NO

Are sexual abuse claims alleged by: Johnny Dyson? NO

Are sexual abuse claims alleged by: Michael Eden? NO

Are sexual abuse claims alleged by: Robert Edwards? NO

Are sexual abuse claims alleged by: Randy Eller? NO

Are sexual abuse claims alleged by: William Elliott? NO

Are sexual abuse claims alleged by: David Ellis? NO

Are sexual abuse claims alleged by: Mario Enriquez? NO

Are sexual abuse claims alleged by: Rodger Ezell? NO

Are sexual abuse claims alleged by: Emila Faaumu? NO

Are sexual abuse claims alleged by: Michael Fannon? NO

Are sexual abuse claims alleged by: Richard Farley? NO

Are sexual abuse claims alleged by: Jeffery Farris? NO

Are sexual abuse claims alleged by: Donald Feathers? NO

Are sexual abuse claims alleged by: Richard Fike? NO

Are sexual abuse claims alleged by: Mike Findlay? NO

Are sexual abuse claims alleged by: Dexter Florence? NO

Are sexual abuse claims alleged by: Alfonso Flores? NO

Are sexual abuse claims alleged by: Douglas Fogg? NO

Are sexual abuse claims alleged by: William Foley? NO

Are sexual abuse claims alleged by: Jeffrey Forrester? NO

Are sexual abuse claims alleged by: Gregory Fortado? NO

Are sexual abuse claims alleged by: Leandro Fortyz? NO

Are sexual abuse claims alleged by: Maurice Fowler? NO

Are sexual abuse claims alleged by: Gary Fox? NO

Are sexual abuse claims alleged by: Albert Fritts? NO

Are sexual abuse claims alleged by: Daniel Gambler? NO

Are sexual abuse claims alleged by: Perfecto Garcia? NO

Are sexual abuse claims alleged by: Steven Gathman? NO

Are sexual abuse claims alleged by: William Gaudesi? NO

Are sexual abuse claims alleged by: Geoffrey Ghiandoni? NO

Are sexual abuse claims alleged by: Michael Girard? NO

Are sexual abuse claims alleged by: Russell Glidewell? NO

Are sexual abuse claims alleged by: Brent Glover? NO

Are sexual abuse claims alleged by: James Goehring? NO

Are sexual abuse claims alleged by: Kelly Goehring? NO

Are sexual abuse claims alleged by: Rudy Gonzales? NO

Are sexual abuse claims alleged by: Ricky Goodrich? NO

Are sexual abuse claims alleged by: Robert Gorgacz? NO

Are sexual abuse claims alleged by: Robert Gould? NO

Are sexual abuse claims alleged by: Rodney Grady? NO

Are sexual abuse claims alleged by: Christoph Graham? NO

Are sexual abuse claims alleged by: Damen Graham? NO

Are sexual abuse claims alleged by: Michael Grasser? NO

Are sexual abuse claims alleged by: Kevin Green? NO

Are sexual abuse claims alleged by: Karlton Gregson? NO

Are sexual abuse claims alleged by: Alma Guerrero? NO

Are sexual abuse claims alleged by: Chuck Gurwell? NO

Are sexual abuse claims alleged by: Brittany Haley? NO

Are sexual abuse claims alleged by: John Haley? NO

Are sexual abuse claims alleged by: Jason Hall? NO

Are sexual abuse claims alleged by: Lee Hall? NO

Are sexual abuse claims alleged by: Melanie Haney? NO

Are sexual abuse claims alleged by: Stephen Hanson? NO

Are sexual abuse claims alleged by: Wesley Hardesty? NO

Are sexual abuse claims alleged by: Robert Harding? NO

Are sexual abuse claims alleged by: Thomas Hardy? NO

Are sexual abuse claims alleged by: Randal Hash? NO

Are sexual abuse claims alleged by: Freddie Hawkins? NO

Are sexual abuse claims alleged by: Gregory Hayes? NO

Are sexual abuse claims alleged by: John Hayes? NO

Are sexual abuse claims alleged by: Norman Hayward? NO

Are sexual abuse claims alleged by: Patrick Hazelwood? NO

Are sexual abuse claims alleged by: William Heald? NO

Are sexual abuse claims alleged by: Richard Heaning? NO

Are sexual abuse claims alleged by: James Henry? NO

Are sexual abuse claims alleged by: Gilbert Hernandez? NO

Are sexual abuse claims alleged by: Robert Hernandez? NO

Are sexual abuse claims alleged by: William Hertz? NO

Are sexual abuse claims alleged by: William Hicks? NO

Are sexual abuse claims alleged by: Richard Hillis? NO

Are sexual abuse claims alleged by: Jorge Himan? NO

Are sexual abuse claims alleged by: Cynthia Hochhalter? NO

Are sexual abuse claims alleged by: George Hoening? NO

Are sexual abuse claims alleged by: Keith Holding? NO

Are sexual abuse claims alleged by: Anthony Holliday? NO

Are sexual abuse claims alleged by: Thomas Holmquist? NO

Are sexual abuse claims alleged by: Terry Hood? NO

Are sexual abuse claims alleged by: Salina Hoover? NO

Are sexual abuse claims alleged by: Geoffrey Howe? NO

Are sexual abuse claims alleged by: Russell Howes? NO

Are sexual abuse claims alleged by: Robert Hoyvald? NO

Are sexual abuse claims alleged by: Donald Hughes? NO

Are sexual abuse claims alleged by: Perrywinn Hunt? NO

Are sexual abuse claims alleged by: Charles K Jackson? NO

Are sexual abuse claims alleged by: George Jackson? NO

Are sexual abuse claims alleged by: James Jezak? NO

Are sexual abuse claims alleged by: Erran Johnson? NO

Are sexual abuse claims alleged by: Gary Johnson? NO

Are sexual abuse claims alleged by: Joe Johnson? NO

Are sexual abuse claims alleged by: Kenneth Johnson? NO

Are sexual abuse claims alleged by: Richard Johnson? NO

Are sexual abuse claims alleged by: Travis Johnson? NO

Are sexual abuse claims alleged by: Wendell Johnson? NO

Are sexual abuse claims alleged by: Jesse Jones? NO

Are sexual abuse claims alleged by: Michael Jones? NO

Are sexual abuse claims alleged by: Sidney Jones? NO

Are sexual abuse claims alleged by: Ezequiel Jurado? NO

Are sexual abuse claims alleged by: Martin Kapp? NO

Are sexual abuse claims alleged by: Rhonda Kastner? NO

Are sexual abuse claims alleged by: Amir Kazemi? NO

Are sexual abuse claims alleged by: Michael Keith? NO

Are sexual abuse claims alleged by: Jeffrey Kelley? NO

Are sexual abuse claims alleged by: Joseph Ketchum? NO

Are sexual abuse claims alleged by: Ronald Killen? NO

Are sexual abuse claims alleged by: Christoph Kinch? NO

Are sexual abuse claims alleged by: Joseph King? NO

Are sexual abuse claims alleged by: Alan Kirkland? NO

Are sexual abuse claims alleged by: Joseph Klapperich? NO

Are sexual abuse claims alleged by: John Klinginsmith? NO

Are sexual abuse claims alleged by: John Knight? NO

Are sexual abuse claims alleged by: Wendy Koenig? NO

Are sexual abuse claims alleged by: Gregory Kohler? NO

Are sexual abuse claims alleged by: Joseph Krewko? NO

Are sexual abuse claims alleged by: Leonard Krupski? NO

Are sexual abuse claims alleged by: Louis Labella? NO

Are sexual abuse claims alleged by: Thomas Lamb? NO

Are sexual abuse claims alleged by: Paul Lampasso? NO

Are sexual abuse claims alleged by: Kenneth Langley? NO

Are sexual abuse claims alleged by: Jennifer Laparr? NO

Are sexual abuse claims alleged by: Lalea Lazar? NO

Are sexual abuse claims alleged by: Mildred Lee? NO

Are sexual abuse claims alleged by: Joseph Lemanek? NO

Are sexual abuse claims alleged by: John Lemmon? NO

Are sexual abuse claims alleged by: Jesse Leon? NO

Are sexual abuse claims alleged by: Gilbert Leveck? NO

Are sexual abuse claims alleged by: Arturo Lopez? NO

Are sexual abuse claims alleged by: Larry Lopez? NO

Are sexual abuse claims alleged by: Miguel Lopez? NO

Are sexual abuse claims alleged by: Jason Loyd? NO

Are sexual abuse claims alleged by: Paul Lucero? NO

Are sexual abuse claims alleged by: Amy Lunger? NO

Are sexual abuse claims alleged by: Andrew Lunsford? NO

Are sexual abuse claims alleged by: Gerald Lupinos? NO

Are sexual abuse claims alleged by: Wendell Lynch? NO

Are sexual abuse claims alleged by: Danielle Lynn? NO

Are sexual abuse claims alleged by: Michael Lyon? NO

Are sexual abuse claims alleged by: Thomas Macfarlan? NO

Are sexual abuse claims alleged by: Alan Machiela? NO

Are sexual abuse claims alleged by: Michael Mackenzie? NO

Are sexual abuse claims alleged by: Charles Maddox? NO

Are sexual abuse claims alleged by: Frank Majors? NO

Are sexual abuse claims alleged by: Chris Mallaburn? NO

Are sexual abuse claims alleged by: Vincent Marinaccio? NO

Are sexual abuse claims alleged by: Harry Martin? NO

Are sexual abuse claims alleged by: Robert Martin? NO

Are sexual abuse claims alleged by: Gerardo Martinez? NO

Are sexual abuse claims alleged by: Joseph Martinez? NO

Are sexual abuse claims alleged by: David Mausling? NO

Are sexual abuse claims alleged by: Donald Mccann? NO

Are sexual abuse claims alleged by: Dale Mcclure? NO

Are sexual abuse claims alleged by: Logan Mccune? NO

Are sexual abuse claims alleged by: Harold Mckeehan? NO

Are sexual abuse claims alleged by: Brendan Mcmahon? NO

Are sexual abuse claims alleged by: Kevin Mcnemar? NO

Are sexual abuse claims alleged by: Felipe Mendoza? NO

Are sexual abuse claims alleged by: Marielena Mendoza? NO

Are sexual abuse claims alleged by: Reid Metcalf? NO

Are sexual abuse claims alleged by: Ray Miley? NO

Are sexual abuse claims alleged by: Jennifer Miller? NO

Are sexual abuse claims alleged by: Roger Miller? NO

Are sexual abuse claims alleged by: Tracy Miller? NO

Are sexual abuse claims alleged by: Melissa Millwood? NO

Are sexual abuse claims alleged by: Michael Milroy? NO

Are sexual abuse claims alleged by: Gene Miltner? NO

Are sexual abuse claims alleged by: James Moman? NO

Are sexual abuse claims alleged by: Joseph Moore? NO

Are sexual abuse claims alleged by: Robert Moore? NO

Are sexual abuse claims alleged by: Samuel Morin? NO

Are sexual abuse claims alleged by: Gary Moring? NO

Are sexual abuse claims alleged by: Pete Morrison? NO

Are sexual abuse claims alleged by: Mary Morrow? NO

Are sexual abuse claims alleged by: Dustin Murray? NO

Are sexual abuse claims alleged by: Mark Napoles? NO

Are sexual abuse claims alleged by: Timmie Nassif? NO

Are sexual abuse claims alleged by: Thomas Nelson? NO

Are sexual abuse claims alleged by: Alvin Neumann? NO

Are sexual abuse claims alleged by: Daniel Nichols? NO

Are sexual abuse claims alleged by: Ronald Norman? NO

Are sexual abuse claims alleged by: Curtis Nuckles? NO

Are sexual abuse claims alleged by: Terry Nylund? NO

Are sexual abuse claims alleged by: Martin Oakley? NO

Are sexual abuse claims alleged by: John Oldfather? NO

Are sexual abuse claims alleged by: Walter Oldham? NO

Are sexual abuse claims alleged by: James L Oody? NO

Are sexual abuse claims alleged by: Walter Osterberg? NO

Are sexual abuse claims alleged by: Mitchell Ott? NO

Are sexual abuse claims alleged by: James Overturf? NO

Are sexual abuse claims alleged by: Charles Owen? NO

Are sexual abuse claims alleged by: Eric Pacheco? NO

Are sexual abuse claims alleged by: Clifton Pappion? NO

Are sexual abuse claims alleged by: David Park? NO

Are sexual abuse claims alleged by: Jason Patrylo? NO

Are sexual abuse claims alleged by: Steve Patterson? NO

Are sexual abuse claims alleged by: James Paulette? NO

Are sexual abuse claims alleged by: Donald Payne? NO

Are sexual abuse claims alleged by: Randy Payne? NO

Are sexual abuse claims alleged by: Temper Payne? NO

Are sexual abuse claims alleged by: Patrick Pearce? NO

Are sexual abuse claims alleged by: Eric Petty? NO

Are sexual abuse claims alleged by: Justin Pickler? NO

Are sexual abuse claims alleged by: Jeffrey Pluff? NO

Are sexual abuse claims alleged by: Robert Polacek? NO

Are sexual abuse claims alleged by: Francis Poling? NO

Are sexual abuse claims alleged by: Keith Pond? NO

Are sexual abuse claims alleged by: Anette Poplarchick? NO

Are sexual abuse claims alleged by: Hector Poventud? NO

Are sexual abuse claims alleged by: Neal Powell? NO

Are sexual abuse claims alleged by: Gregory Prange? NO

Are sexual abuse claims alleged by: Kevin Prokop? NO

Are sexual abuse claims alleged by: Joseph Pruitt? NO

Are sexual abuse claims alleged by: Raymond Pullen? NO

Are sexual abuse claims alleged by: Ronald Pumphrey? NO

Are sexual abuse claims alleged by: Vincent Quintana? NO

Are sexual abuse claims alleged by: Thomas Rainey? NO

Are sexual abuse claims alleged by: David Ramos? NO

Are sexual abuse claims alleged by: Marshall Ramsey? NO

Are sexual abuse claims alleged by: Frank Randall? NO

Are sexual abuse claims alleged by: Joseph Reyes? NO

Are sexual abuse claims alleged by: Michael Ricciardi? NO

Are sexual abuse claims alleged by: Steven Rich? NO

Are sexual abuse claims alleged by: Tommy Richards? NO

Are sexual abuse claims alleged by: Linda Richardson? NO

Are sexual abuse claims alleged by: Kenneth Richey? NO

Are sexual abuse claims alleged by: Allen Richter? NO

Are sexual abuse claims alleged by: Richard Riel? NO

Are sexual abuse claims alleged by: Michael Rienzo? NO

Are sexual abuse claims alleged by: Bill Riley? NO

Are sexual abuse claims alleged by: Ervin Roberson? NO

Are sexual abuse claims alleged by: Stephen Roberts? NO

Are sexual abuse claims alleged by: Stephen Rosenthal? NO

Are sexual abuse claims alleged by: Edward Roth? NO

Are sexual abuse claims alleged by: Ronald Rouse? NO

Are sexual abuse claims alleged by: Sylvester Rush? NO

Are sexual abuse claims alleged by: Lawrence Russell? NO

Are sexual abuse claims alleged by: Nathan Russell? NO

Are sexual abuse claims alleged by: Cristian Sanchez? NO

Are sexual abuse claims alleged by: John Santistevan? NO

Are sexual abuse claims alleged by: Henry Santo? NO

Are sexual abuse claims alleged by: Jose Santos? NO

Are sexual abuse claims alleged by: William Savage? NO

Are sexual abuse claims alleged by: Joseph Schiavone? NO

Are sexual abuse claims alleged by: Daniel Schimmel? NO

Are sexual abuse claims alleged by: Frank Schneider? NO

Are sexual abuse claims alleged by: Daniel Scott? NO

Are sexual abuse claims alleged by: Steven Seamons? NO

Are sexual abuse claims alleged by: Carson Shaffer? NO

Are sexual abuse claims alleged by: Jason Shead? NO

Are sexual abuse claims alleged by: William Shearer? NO

Are sexual abuse claims alleged by: William Shelton? NO

Are sexual abuse claims alleged by: Charles Simmons? NO

Are sexual abuse claims alleged by: Anthony Simon? NO

Are sexual abuse claims alleged by: Doris Simons? NO

Are sexual abuse claims alleged by: David Sizemore? NO

Are sexual abuse claims alleged by: Benjamin Smith? NO

Are sexual abuse claims alleged by: Danny Smith? NO

Are sexual abuse claims alleged by: Jacob Smith? NO

Are sexual abuse claims alleged by: Lawrence Smith? NO

Are sexual abuse claims alleged by: Michael A Smith? NO

Are sexual abuse claims alleged by: David Snook? NO

Are sexual abuse claims alleged by: Joseph Sparrow? NO

Are sexual abuse claims alleged by: John Spraggins? NO

Are sexual abuse claims alleged by: Russell Spruill? NO

Are sexual abuse claims alleged by: Pierre St. Germain? NO

Are sexual abuse claims alleged by: David Stetson? NO

Are sexual abuse claims alleged by: Terri Stephens? NO

Are sexual abuse claims alleged by: Jimmy Stewart? NO

Are sexual abuse claims alleged by: John Stewart? NO

Are sexual abuse claims alleged by: Larry Stewart? NO

Are sexual abuse claims alleged by: Thomas Stockdale? NO

Are sexual abuse claims alleged by: Sandra Stoddard? NO

Are sexual abuse claims alleged by: David Sullivan? NO

Are sexual abuse claims alleged by: Jack Sullivan? NO

Are sexual abuse claims alleged by: Melissa Surkamer? NO

Are sexual abuse claims alleged by: Gary Swain? NO

Are sexual abuse claims alleged by: Jese Sweeney? NO

Are sexual abuse claims alleged by: Jerry Switzer? NO

Are sexual abuse claims alleged by: Michael Talik? NO

Are sexual abuse claims alleged by: Elijah Taylor? NO

Are sexual abuse claims alleged by: John Taylor? NO

Are sexual abuse claims alleged by: Jessica Thomas? NO

Are sexual abuse claims alleged by: Robert Thomas? NO

Are sexual abuse claims alleged by: Christoph Townsend? NO

Are sexual abuse claims alleged by: Walter Traugh? NO

Are sexual abuse claims alleged by: Joshua Truesdell? NO

Are sexual abuse claims alleged by: Scot Tucker? NO

Are sexual abuse claims alleged by: Rich Turner? NO

Are sexual abuse claims alleged by: Tim Van Engelenhoven? NO

Are sexual abuse claims alleged by: Wilson Velez? NO

Are sexual abuse claims alleged by: Robert Venesky? NO

Are sexual abuse claims alleged by: Trian Vian? NO

Are sexual abuse claims alleged by: Casey Vickers? NO

Are sexual abuse claims alleged by: Ruben Villanueva? NO

Are sexual abuse claims alleged by: Shannon Wagner? NO

Are sexual abuse claims alleged by: Brian Walker? NO

Are sexual abuse claims alleged by: Christoph Walker? NO

Are sexual abuse claims alleged by: Donald Wallace? NO

Are sexual abuse claims alleged by: Robert Walette? NO

Are sexual abuse claims alleged by: William Ward? NO

Are sexual abuse claims alleged by: Larry Washington? NO

Are sexual abuse claims alleged by: Latrista Weatherspoon? NO

Are sexual abuse claims alleged by: Todd Whitcomb? NO

Are sexual abuse claims alleged by: Walker White? NO

Are sexual abuse claims alleged by: Lewis Wilcher? NO

Are sexual abuse claims alleged by: William Wildman? NO

Are sexual abuse claims alleged by: Tyler Wilkinson? NO

Are sexual abuse claims alleged by: Benjamin Williams? NO

Case Caption: PEREZ GEORGE VS THE 3M COMPANY

Case Initiation Date: 06/24/2024

Attorney Name: ALAN TODD FRIEDMAN

Firm Name: BAGOLIE FRIEDMAN LLC

Address: 648 NEWARK AVENUE

JERSEY CITY NJ 07306

Phone: 2016568500

Name of Party: PLAINTIFF : Perez, George

Name of Defendant's Primary Insurance Company

(if known): Unknown

Are sexual abuse claims alleged by: John Williams? NO

Are sexual abuse claims alleged by: James Williams? NO

Are sexual abuse claims alleged by: Michael Williams? NO

Are sexual abuse claims alleged by: William Wilson? NO

Are sexual abuse claims alleged by: Bernd Winderlich? NO

Are sexual abuse claims alleged by: Tinisha Witt? NO

Are sexual abuse claims alleged by: Gregory Zanetell? NO

Are sexual abuse claims alleged by: Vernon Zimmerman? NO

Are sexual abuse claims alleged by: Robert Zouse? NO

Are sexual abuse claims alleged by: Anthony Cox? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO Medical Debt Claim? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

06/24/2024

Dated

/s/ ALAN TODD FRIEDMAN

Signed

MORRIS COUNTY SUPERIOR COURT
PO BOX 910
MORRISTOWN NJ 07963

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (862) 397-5700
COURT HOURS 8:30 AM - 4:30 PM

DATE: JUNE 24, 2024
RE: PEREZ GEORGE VS THE 3M COMPANY
DOCKET: MRS L -001206 24

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON STEPHAN C. HANSBURY

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
AT: (862) 397-5700 EXT 75351.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: ALAN T. FRIEDMAN
BAGOLIE FRIEDMAN LLC
648 NEWARK AVENUE
JERSEY CITY NJ 07306

ECOURTS